

MORRISON COHEN LLP

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Jason P. Gottlieb, Esq.

Heath D. Rosenblat, Esq.

Special Litigation and Enforcement Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**SUMMARY SHEET FOR THIRD INTERIM APPLICATION
OF MORRISON COHEN LLP, SPECIAL LITIGATION AND
ENFORCEMENT COUNSEL TO THE DEBTORS, FOR ALLOWANCE
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
FOR REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES
INCURRED FROM OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

Name of Applicant:	Morrison Cohen LLP
Authorized to Provide Services to:	Genesis Global Holdco, LLC, <i>et al.</i>
Date of Retention:	An entered order [ECF No. 106], dated February 24, 2023, authorizing retention <i>nunc pro tunc</i> to the Petition Date (<i>i.e.</i> , January 19, 2023), as applicable for each Debtor.
Period for which Compensation and Expenses are Sought:	10/1/2023 through 1/31/2024

<u>Summary of Total Fees and Expenses Requested</u>	
Total Compensation Sought for the Third Fee Period	\$168,061.50
Total Expense Reimbursement Sought for the Third Fee Period	\$113.60
Total Allowed Fees Paid to Date	\$1,162,593.56
Total Allowed Expenses Paid to Date	\$18,649.87
Fees Sought for the Third Fee Period Already Paid Pursuant to Monthly Fee Statements But Not Yet Allowed	\$134,449.20
Expenses Sought for the Third Fee Period Already Paid Pursuant to Monthly Fee Statements But Not Yet Allowed	\$113.60
Total Fees and Expenses Sought for the Third Fee Period Already Paid Pursuant to Monthly Fee Statements But Not Yet Allowed	\$134,562.80
Total Fees Sought for this Third Fee Period Not Yet Paid (15% of Total Compensation Sought for the Third Fee Period)	\$25,209.23
Total Expenses Sought for this Third Fee Period Not Yet Paid	\$0
Total Fees and Expenses Sought for this Third Fee Period Not Yet Paid	\$25,209.23
Total Fees Allowed But Not Paid for the Second Fee Period (5% of Total Compensation Allowed) ¹	\$11,543.33
Total Fees Allowed But Not Paid for the First Fee Period (5% of Total Compensation Allowed) ²	\$45,575.81 ³
This is an: ___ monthly <u>X</u> interim ___ final application.	

¹ See Omnibus Order Granting Applications for Allowance of Interim Compensation and Reimbursement of Expenses for the Second Interim Period [ECF No. 1051].

² See Omnibus Order Granting Applications for Allowance of Interim Compensation and Reimbursement of Expenses for the First Interim Period [ECF No. 708].

³ Numbers based on Debtors' records that we will continue to reconcile against our own.

<u>Summary of Prior Monthly Fee Statements</u>					
Date Filed and ECF No.	Third Fee Period	Total Fees Incurred for Third Fee Period	Total Expenses Incurred for Third Fee Period	Total Fees Previously Requested in Prior Monthly Fee Statements (at 80%)	Total Expenses Previously Requested in Prior Monthly Fee Statements (at 100%)
<i>Third Interim Application</i>					
11/21/2023 ECF No. 963	October 1, 2023 through October 30, 2023	\$74,359.00	\$49.60	\$59,487.20	\$49.60
12/20/2023 ECF No. 1067	November 1, 2023 through November 30, 2023	\$24,949.00	\$16.00	\$19,959.20	\$16.00
1/22/2024 ECF No. 1183	December 1, 2023 through December 31, 2023	\$16,676.50	\$32.00	\$13,341.20	\$32.00
2/22/2024 ECF No. 1357	January 1, 2024 through January 31, 2024	\$52,077.00	\$16.00	\$41,661.60	\$16.00
Total for Third Interim Application		\$168,061.50	\$113.60	\$134,449.20	\$113.60

Summary of Any Objections to Monthly Fee Statements: None.

Fees and Expenses Sought in this Third Interim Application Not Yet Paid: \$25,209.23

<u>Compensation by Professional for Third Fee Period</u>						
<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to NY Bar</u>	<u>Rate</u>	<u>Hours</u>	<u>Fee</u>
Partners						
Gottlieb, Jason P.	Partner	Digital Assets	2002	\$1,400.00	14.4	\$20,160.00
Gottlieb, Jason P.	Partner	Digital Assets	2002	\$1,200.00	40.6	\$48,720.00
Mix, Michael	Partner	Digital Assets	2012	\$875.00	6.1	\$5,337.00
Isaacs, Daniel C.	Partner	Digital Assets	2011	\$975.00	23.2	\$22,620.00
Isaacs, Daniel C.	Partner	Digital Assets	2011	\$875.00	14.7	\$12,862.50
Rosenblat, Heath D.	Partner	Bankruptcy, Restructuring & Governance	2003	\$1,000.00	0.8	\$800.00
Rosenblat, Heath D.	Partner	Bankruptcy, Restructuring & Governance	2003	\$900.00	3.8	\$3,420.00
Associates						
Roth, Will I.	Associate	Digital Assets	2017	\$770.00	8.1	\$6,237.00
Roth, Will I.	Associate	Digital Assets	2017	\$700.00	28.7	\$20,090.00
Upadhyaya, Vani T.	Associate	Digital Assets	2020	\$580.00	9.5	\$5,510.00
Contract Attorneys						
Siconolfi, Sally	Contract Attorney	Bankruptcy, Restructuring & Governance	2005	\$650.00	24.4	\$15,860.00

<u>Compensation by Professional for Third Fee Period</u>						
<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to NY Bar</u>	<u>Rate</u>	<u>Hours</u>	<u>Fee</u>
Paralegals and Litigation Support						
Knox, Tukisha	Paralegal	Bankruptcy, Restructuring & Governance	n/a	\$505.00	1.0	\$505.00
Knox, Tukisha	Paralegal	Bankruptcy, Restructuring & Governance	n/a	\$485.00	4.8	\$2,328.00
Schou, Sarah A.	Paralegal	Litigation	n/a	\$350.00	9.5	\$3,325.00
Yan, Ken	Litigation Support Specialist	Litigation	n/a	\$330.00	0.8	\$264.00
Crawley, Brianna S.	Docket Clerk	Litigation	n/a	\$225.00	0.1	\$22.50
Grand Total					190.5	\$168,061.50

<u>Total Fees for Compensation Period</u>			
	Blended Rate	Total Hours Billed	Total Fees
Partners	\$1099.61	103.6	\$113,920.00
Associates	\$687.62	46.3	\$31,837.00
Contract Attorneys	\$650.00	24.4	\$15,860.00
Paralegals and Litigation Support	\$397.81	16.2	\$6,444.50
Blended Attorney Rate		\$927.23	
Blended Rate for All Timekeepers		\$88.21	
Total Fees Incurred		\$168,061.50	

<u>Compensation by Project Category for Third Fee Period</u>		
Matter/Description	Total Hours Billed	Total Fees
B110 Case Administration	32.8	\$29,210.50
B160 Fee/Employment Applications	15.0	\$10,090.00
B190 Litigation	142.7	\$128,761.00
Total	190.5	\$168,061.50

<u>Expense Summary for Third Fee Period</u>	
Expense Category	Total
Relativity Hosting Fee	\$96.00
Lexis	\$17.60
Grand Total Expenses	\$113.60

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**UNITED STATES BANKRUPTCY COURT
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In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

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**THIRD INTERIM APPLICATION
OF MORRISON COHEN LLP, SPECIAL LITIGATION AND
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ALLOWANCE OF COMPENSATION FOR PROFESSIONAL
SERVICES RENDERED AND FOR REIMBURSEMENT OF
ACTUAL AND NECESSARY EXPENSES INCURRED FROM
OCTOBER 1, 2023 THROUGH JANUARY 31, 2024**

TO THE HONORABLE SEAN H. LANE,
UNITED STATES BANKRUPTCY JUDGE:

Morrison Cohen LLP (“MC”) hereby makes its third interim fee application (“**Third Interim Application**”) for an award of interim compensation for professional services rendered, and reimbursement for actual and necessary expenses incurred in connection with such services,

¹ The debtors and debtors-in-possession (collectively, “**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

for the period October 1, 2023 through January 31, 2024 (“**Third Fee Period**”) and respectfully represents:

PRELIMINARY STATEMENT

Genesis Global Holdco, LLC (“**Holdco**”) and its affiliated debtors and debtors-in-possession in the above-captioned jointly-administered cases (*i.e.*, the Debtors) employed MC, pursuant to sections 327(e) and 330 of title 11 of the United States Code (“**Bankruptcy Code**”), Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”), and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York (“**Local Rules**”), as special litigation and enforcement counsel to the Debtors in these Chapter 11 Cases.

During MC’s retention related to and during the Third Fee Period, MC has provided services to the Debtors for numerous discrete tasks concerning, among many others:

- Advising the Debtors as to their rights and obligations in connection with numerous actions (“**Litigations**”);
- Communicating with opposing counsel in the Litigations on the Debtors’ behalf;
- Appearing in and participating in the Litigations on the Debtors’ behalf;
- Researching and analyzing various legal issues related to the Litigations;
- Providing advice on certain questions relating to the Litigations that may arise in the normal course of business;
- Advising the Debtors as to their rights and obligations with respect to inquiries and investigations by federal and state regulators and law enforcement agencies (collectively, “**Investigations**”);
- Communicating with regulators and governmental agencies;
- Responding to document information requests from regulators and governmental agencies;
- Addressing legal issues related to the Investigations; and
- Advising on regulatory issues in the normal course of business.

JURISDICTION

1. The United States Bankruptcy Court for the Southern District of New York (“**Bankruptcy Court**”) has jurisdiction over the Chapter 11 Cases and this Third Interim Application pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the Southern District of New York dated January 31, 2012 (Preska, C.J.). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b), and the Bankruptcy Court may enter a final order consistent with Article III of the United States Constitution. The statutory predicates for the relief requested herein are sections 327(e) and 330 of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 2016, and Rules 2014-1 and 2016-1 of the Local Rules.

FEES AND EXPENSES FOR WHICH ALLOWANCE IS SOUGHT

3. As set forth above, this Third Interim Application is made pursuant to sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016(a) of the Bankruptcy Rules, Rule 2016-1 of the Local Rules, the Appendix B Guidelines, the Bankruptcy Court’s administrative *General Order M-447* setting forth the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases* (“**Local Guidelines**” and, together with the Appendix B Guidelines, “**Guidelines**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, dated February 24, 2023 (“**Interim Compensation Order**”) [ECF No. 101], for an interim award of compensation for services rendered to the Debtors during the Third Fee Period in the amount of \$168,061.50 and for reimbursement of expenses in the amount of \$113.60 incurred in connection with the rendition of such services.

4. During the Third Fee Period, MC's attorneys and paraprofessionals expended a total of 190.5 hours. The blended hourly rate for MC during the Third Fee Period was approximately \$882.21.

5. A schedule setting forth the number of hours expended by the partners, associates, and paraprofessionals, their respective hourly rates, and the year in which each attorney was admitted to practice is attached hereto as **Exhibit A**. A schedule specifying the type of expenses for which MC is seeking reimbursement and the total amount for each such category is attached hereto as **Exhibit B**.

6. MC maintains computerized records of the daily time entries completed by all the MC attorneys and paraprofessionals. Preceding the time entries is a chart listing the names, billing rates, and time spent by each of the attorneys and paraprofessionals rendering services on behalf of the Debtors. In support of the Third Interim Application and consistent with the Interim Compensation Order, copies of these computerized records, together with a computer-generated detailed itemization of the expenses incurred by MC for which reimbursement is sought, have been furnished to the Bankruptcy Court and the United States Trustee (and copies have been filed publicly on the docket with the Monthly Fee Statements (defined below)).

7. Pursuant to the terms of the Interim Compensation Order, MC has, to date, filed four monthly invoices covering a five-month period (collectively, "**Monthly Fee Statements**"): (a) for the period from October 1 through October 31, 2023 in the amount of \$74,359.00 for fees and \$49.60 for expenses ("**October Fee Statement**") [ECF No. 963]; (b) for the period from November 1 through November 30, 2023 in the amount of \$24,949.00 for fees and \$16.00 for expenses ("**November Fee Statement**") [ECF No. 1067]; (c) for the period from December 1 through December 31, 2023 in the amount of \$16,676.50 for fees and \$32.00 for expenses

(“**December Fee Statement**”) [ECF No. 1183]; and (d) for the period from January 1 through January 31, 2024 in the amount of \$52,077.00 for fees and \$16.00 for expenses (“**January Fee Statement**”) [ECF No. 1357]. Copies of the Monthly Fee Statements, which include MC’s time entries for the Third Fee Period, are attached to this Third Interim Application as **Exhibit C**.

8. Pursuant to the terms of the Interim Compensation Order, each month MC served a copy of its Monthly Fee Statements, supported by time and disbursement records and a summary of services rendered and expenses incurred, upon each of the Notice Parties (defined in the Interim Compensation Order) in the format specified by the Guidelines, allowing each of the Notice Parties an opportunity to review and object to the Monthly Fee Statements.²

9. During the four-month period covered by the Third Fee Period, MC submitted Monthly Fee Statements for fees aggregating \$168,061.50 and expenses totaling \$113.60.³

10. MC sought payment of 80% of the fees and 100% of the expenses covered by the October through January Monthly Fee Statements. With respect to the October Fee Statement, MC received a payment of \$59,536.80, representing 80% of fees requested in the amount of \$74,359.00 and 100% of expenses requested in the amount of \$49.60. With respect to the November Fee Statement, MC received a payment of \$19,975.20, representing 80% of fees requested in the amount of \$24,949.00 and 100% of expenses requested in the amount of \$16.00. With respect to the December Fee Statement, MC received a payment of \$13,373.20, representing 80% of fees requested in the amount of \$16,676.50 and 100% of expenses requested in the amount of \$32.00. With respect to the January Fee Statement, MC received a payment of \$41,677.60, representing

² No objections have been made to the Monthly Fee Statements.

³ To the extent that time for services rendered or disbursements incurred, if any, related to the Third Fee Period were not processed prior to the preparation of this Application, MC reserves the right to request compensation for such services and reimbursement of such expenses in a future fee application.

80% of fees requested in the amount of \$52,077.00 and 100% of expenses requested in the amount of \$16.00.

11. As set forth in the Certification of Heath D. Rosenblat, a partner in MC, attached hereto as **Exhibit D**, all of the services for which interim compensation is sought were reasonable, necessary, and on behalf of the Debtors with respect to the Litigations, the Investigations, and in coordination with Debtors' counsel concerning certain matters of the Chapter 11 Cases.

CASE BACKGROUND AND RETENTION OF MC

12. On January 19, 2023, each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the date of such filing, "Petition Date"). The Debtors are operating their businesses as debtors-in-possession under sections 1107(a) and 1108 of the Bankruptcy Code. On February 4, 2023, an official committee of unsecured creditors was appointed in the Chapter 11 Cases.

13. On January 20, 2023, the Debtors filed their Joint Chapter 11 Plan. On June 13, 2023, the Debtors filed their Amended Joint Chapter 11 Plan and Disclosure Statement related thereto. The Bankruptcy Court held a hearing to consider confirmation of the Debtors Amended Joint Chapter 11 Plan on February 26, 2024.

14. Pursuant to an Order entered on February 24, 2023 [ECF No. 106], MC was authorized to serve as special litigation and enforcement counsel for the Debtors, *nunc pro tunc* to the Petition Date.

15. The following matters, among others, were identified for MC to handle:

- Advising the Debtors as to the Litigations;
- Communicating with opposing counsel in the Litigations on the Debtors' behalf;
- Appearing in and participating in the Litigations on the Debtors' behalf;

- Researching and analyzing various legal issues related to the Litigations;
- Providing advice on certain questions relating to the Litigations that may arise in the normal course of business;
- Advising the Debtors as to Investigations;
- Communicating with regulators and governmental agencies;
- Responding to document information requests from regulators and governmental agencies;
- Addressing legal issues related to the Investigations; and
- Advising on regulatory issues in the normal course of business.

16. In considering this Third Interim Application, it should be noted that MC has considerable experience in representing debtors in chapter 11 cases, as well as acting as special litigation counsel to debtors in Chapter 7 and Chapter 11 matters. MC has likewise acted in a professional capacity in a multitude of cases representing the interests of trustees, debtors, creditors' committees, and secured creditors.

17. It is believed that the work encompassed by this Third Interim Application for which compensation is sought was performed efficiently. All of the tasks summarized in this Third Interim Application were performed in such a manner as to ensure minimal duplication of services within MC, as well as with the Debtors' other professionals, in an effort to keep the administration expenses of these estates to a minimum. Before filing each of the monthly fee statements at issue in this Third Interim Application, MC also performed a rigorous review of the fees in order to eliminate any time entries that could be subject to question.

SUMMARY OF LEGAL SERVICES RENDERED

18. The following is a summary description of the primary services rendered by MC during the Third Fee Period that highlights the benefits conferred upon the Debtors and their respective estates and creditors. All of the professional services rendered are set forth in the

computerized time records⁴ maintained by MC and attached to the Monthly Fee Statements (**Exhibit C** to this Third Interim Application), and the Bankruptcy Court is respectfully referred to those records for detail of all of the work performed by MC.

19. Given the nature and role of MC's retention, MC worked on the same tasks as in the previous fee period and its litigation / investigative efforts continued during this Third Fee Period. MC devoted time rendering legal services during the Third Fee Period that included working with the Debtors' other professionals in connection with various aspects of the Chapter 11 Cases, as well as handling the Litigations and the Investigations. As set forth below, the bulk and focus of MC's services, as would be expected given MC's retention as special litigation counsel, services centered around efforts concerning the Litigations and the Investigations. A brief summary of MC's services, which is supplemented in the entirety by the time records attached in full to the Monthly Fee Statements, is described below.

A. Case Administration

Total Fees: \$29,210.50
Total Hours: 32.8

20. During the Third Fee Period, MC coordinated, communicated, and strategized with Debtors' counsel and Debtors' principals regarding the status of the Litigations and the Investigations and the interplay and impacts of each on the Chapter 11 Cases. MC also coordinated with Debtors' counsel on various other matters related to the administration of the Chapter 11 Cases.

⁴ As previously addressed, due to the nature of MC's special counsel retention, confidentiality is necessary in connection with some of MC's efforts and; thus, certain of MC's time entries reflect its efforts to maintain this confidentiality.

B. Fee / Employment Applications

Total Fees: \$10,090.00
Total Hours: 15.0

21. During the Third Fee Period, MC (a) prepared and filed its October Fee Statement, November Fee Statement, December Fee Statement, and January Fee Statement pursuant to the Bankruptcy Code, Local Rules, and UST Guidelines, and (b) prepared its Second Interim Application.

C. Litigations/Investigations

Total Fees: \$128,761.00
Total Hours: 142.7

22. As is evident, the bulk of the time MC spent during the Third Fee Period related to the Litigations and Investigations. Given the nature of these representations, not much can be said specifically on these services. But MC regularly represented the Debtors in connection with discussions, examinations, and negotiations with various litigants concerning the Litigations and with federal and state regulators, law enforcement agencies, and other government agencies concerning the Investigations. MC's work in this regard included, *inter alia*, communications, discovery, drafting, strategy planning, and other litigation and investigative tasks. MC also analyzed opposing counsels' and regulators' varied theories and positions towards possible resolutions with these parties.

ARGUMENT CONCERNING COMPENSATION

23. There are numerous factors to be considered by the Bankruptcy Court in determining allowances of compensation. *See, e.g., In re Woerner*, 783 F.3d 266, 272 (5th Cir. 2015) (enumerating factors to be considered in awarding compensation to professionals); *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), abrogated by *Blanchard v. Bergeron*, 489 U.S. 87 (1989) (same); *see also In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R.

13 (Bankr. S.D.N.Y. 1991) (“Drexel Burnham”); *In re Nine Assocs., Inc.*, 76 B.R. 943 (S.D.N.Y. 1987); *In re Cuisine Magazine, Inc.*, 61 B.R. 210 (Bankr. S.D.N.Y. 1986).

24. Further, in awarding compensation pursuant to section 330 of the Bankruptcy Code to professionals employed under section 327 of the Bankruptcy Code, the Bankruptcy Court must take into account, *inter alia*, the factors enumerated in Section 330 of the Bankruptcy Code.

25. Here the professional services rendered by MC have required substantial time, expertise, and effort. During the Third Fee Period, MC’s professionals and paraprofessionals recorded 190.5 hours — 142.7 hours of which related to the Litigations and the Investigations — providing the above-summarized professional services. MC will continue to perform those services necessary to represent the Debtors as special litigation and enforcement counsel.

26. Time and labor devoted is only one of the many factors to be considered in awarding attorney compensation. Bankruptcy Courts also must consider: (a) the need for the preservation and maximization of value for all participants in these Chapter 11 Cases; (b) the complexity of the matters involved in and handled by MC in these Chapter 11 Cases; (c) the nature and extent of services rendered and the results achieved; (d) MC’s experience, reputation, and ability; (e) the value of MC’s services; and (f) the cost of comparable services other than in a case under the Bankruptcy Code.

27. MC respectfully submits that application of the foregoing criteria more than justifies the compensation requested in this Third Interim Application for the Third Fee Period on an interim basis. As described above, MC provided services to the Debtors during the Third Fee Period concerning a number of matters of varying sophistication and complexity.

28. The professional services rendered here have been performed by attorneys with broad expertise and high levels of skill in their practice areas or specialty. This highly professional

group of attorneys, working together with the Debtors' other professionals, has ensured that these Chapter 11 Cases have progressed in an efficient manner.

29. In view of the foregoing, MC respectfully requests that it be allowed interim compensation in the amount of \$168,061.50 for services rendered during the Third Fee Period.

30. In view of the policy underlying sections 330 and 331 of the Bankruptcy Code that attorneys in bankruptcy cases be compensated on parity with attorneys practicing in other fields, it is respectfully submitted that compensation sought in this Third Interim Application should be allowed as requested.

31. MC reviewed the requirements of the UST Guidelines and believes that this Third Interim Application complies in all material respects with those requirements. To the extent this Third Interim Application does not comply in every respect with the requirements of such guidelines, MC respectfully requests a waiver for any such technical non-compliance.

ACTUAL AND NECESSARY EXPENSES AND DISBURSEMENTS

32. As set forth in **Exhibit B**, attached to this Third Interim Application, MC incurred \$113.60 in expenses in connection with MC providing professional legal services to the Debtors during the Third Fee Period.

NOTICE AND NO PRIOR REQUEST

33. Notice of this Third Interim Application has been served, in compliance with Rule 2002, upon all known creditors and parties-in-interest, all parties requesting notice, and the United States Trustee. MC submits that such notice constitutes good and sufficient notice, and that no other or further notice is required or necessary.

34. No prior request for the relief sought in this Third Interim Application has been made to this Bankruptcy Court or any other court.

CONCLUSION

For the foregoing reasons set-forth above in this Third Interim Application, MC respectfully requests that the Bankruptcy Court enter an order: (a) awarding MC interim compensation and reimbursement of expenses for the Third Fee Period in the amounts of \$168,061.50 and \$113.60, respectively; and (b) directing payment in the amount of \$82,328.37 representing 15% of \$168,061.50 for the Third Fee Period, 5% of \$230,866.50 for the Second Fee Period, and 5% of \$911,516.13 for the First Fee Period; and (c) granting such other and further relief as this Bankruptcy Court deems just and proper under the circumstances.

Dated: New York, New York
March 18, 2024

MORRISON COHEN LLP

By: /s/ Heath D. Rosenblat
Heath D. Rosenblat, Esq.
Jason P. Gottlieb, Esq.

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*Special Litigation and Enforcement Counsel for
Debtors and Debtors-In-Possession*

EXHIBIT A

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Fee Summary for October 1, 2023 through January 31, 2024

<u>Compensation by Professional for Third Fee Period</u>						
<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to NY Bar</u>	<u>Rate</u>	<u>Hours</u>	<u>Fee</u>
Partners						
Gottlieb, Jason P.	Partner	Digital Assets	2002	\$1,400.00	14.4	\$20,160.00
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<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to NY Bar</u>	<u>Rate</u>	<u>Hours</u>	<u>Fee</u>
Contract Attorneys						
Siconolfi, Sally	Contract Attorney	Bankruptcy, Restructuring & Governance	2005	\$650.00	24.4	\$15,860.00
Paralegals and Litigation Support						
Knox, Tukisha	Paralegal	Bankruptcy, Restructuring & Governance	n/a	\$505.00	1.0	\$505.00
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Yan, Ken	Litigation Support Specialist	Litigation	n/a	\$330.00	0.8	\$264.00
Crawley, Brianna S.	Docket Clerk	Litigation	n/a	\$225.00	0.1	\$22.50
Grand Total					190.5	\$168,061.50

EXHIBIT B

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Expense Summary for the Period October 1, 2023 through January 31, 2024

Expense Summary for Third Fee Period	
Expense Category	Total
Relativity Hosting Fee	\$96.00
Lexis	\$17.60
Grand Total Expenses	\$113.60

EXHIBIT C

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Monthly Fee Statements

Objection Deadline: December 6, 2023 at 12PM (Eastern Time)

MORRISON COHEN LLP
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Jason P. Gottlieb, Esq.
Heath D. Rosenblat, Esq.

Special Litigation and Enforcement Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF NINTH FEE STATEMENT THAT OCCURRED IN
THE THIRD FEE APPLICATION PERIOD OF MORRISON
COHEN LLP FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR
THE PERIOD FROM OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	Morrison Cohen LLP
Authorized to Provide Services to:	Genesis Global Holdco, LLC, <i>et al.</i>
Date of Retention:	An entered order [ECF No. 106], dated February 24, 2023, authorizing retention <i>nunc pro tunc</i> to the Petition Date (<i>i.e.</i> , January 19, 2023), as applicable for each Debtor.
Period for which Compensation and Expenses are Sought:	10/01/2023 through 10/31/2023 Monthly Fee Statement for October 2023
Amount of Compensation Requested:	\$74,359.00

¹ The debtors and debtors-in-possession (collectively, “**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, New York 10003.

Less 20% Holdback:	\$14,871.80
Compensation Net of Holdbacks:	\$59,487.20
Amount of Expense Requested:	\$49.60
Total Compensation and Expenses (Net of Holdbacks):	\$59,536.80

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 101] (“**Interim Compensation Order**”), dated February 24, 2023, Morrison Cohen LLP (“**MC**”) hereby submits this Ninth Fee Statement for the month of October 2023 (this “**Ninth Fee Statement**”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtors for the period October 1, 2023 through and including October 31, 2023 (“**Ninth Monthly Fee Period**”). By this Ninth Fee Statement, and after taking into account certain voluntary reductions, MC seeks payment in the amount of \$59,536.80, which comprises (a) 80% of the total amount (\$74,359.00) of compensation sought for actual and necessary services rendered during the Ninth Monthly Fee Period and (b) reimbursement in the amount of \$49.60, which comprises 100% of actual and necessary expenses incurred in accordance with such services.

SERVICES RENDERED AND EXPENSES INCURRED

1. Attached hereto as **Exhibit A** is a summary of MC’s professionals by individual, setting forth the: (a) name and title of each individual who provided services for the Ninth Monthly Fee Period; (b) aggregate hours spent by each individual; (c) MC’s current hourly billing rate for each individual that provided services in the Ninth Monthly Fee Period; (d) amount of fees earned by each MC professional; and (d) year of admittance and jurisdiction for each attorney that is included on this Ninth Fee Statement. The blended hourly billing rate of MC’s timekeepers in the Ninth Monthly Fee Period is approximately \$808.25/hour.

2. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought, by project category for the Ninth Monthly Fee Period.

3. Attached hereto as **Exhibit C** is itemized time records of MC's professionals for the Ninth Monthly Fee Period and summary materials related thereto.

4. Attached hereto as **Exhibit D** is a summary of expenses incurred and reimbursement of expenses sought, by expense type, for the Ninth Monthly Fee Period.

5. Attached hereto as **Exhibit E** is an itemized record of all expenses for the Ninth Monthly Fee Period.

NOTICE OF OBJECTION PROCEDURES

6. Consistent with the terms of the Interim Compensation Order, notice of this Ninth Fee Statement shall be given by email, hand or overnight delivery upon the following parties ("**Notice Parties**"): (a) The Debtors c/o Genesis Global Holdco, LLC, Attn: Arianna Pretto-Sankman (e-mail: arianna@genesistrading.com); (b) Counsel to the Debtors, Cleary Gottlieb Steen & Hamilton, One Liberty Plaza, New York, New York 10006, Attn: Sean A. O'Neal, Esq., Jane VanLare, Esq. (e-mail: soneal@cgsh.com; jvanlare@cgsh.com); (c) The United States Trustee for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Suite 515, New York, New York 10004, Attn: Greg Zipes, Esq. (e-mail: greg.zipes@usdoj.gov); and (d) Counsel to the official committee of unsecured creditors, White & Case LLP, 1221 Avenue of the Americas, 49th Floor, New York, New York 10020, Attn: Philip Abelson and Michele Meises (e-mail: philip.abelson@whitecase.com; michele.meises@whitecase.com) and, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Gregory F. Pesce (e-mail: gregory.pesce@whitecase.com).

7. Objections to this Ninth Fee Statement, if any, must be served upon the Notice Parties, and by e-mail, hand, or overnight delivery, upon MC, 909 Third Avenue, 27th Floor, New York, New York 10022, Attn: Heath D. Rosenblat, Esq. and Jason Gottlieb, Esq. (e-mail: hrosenblat@morrisoncohen.com; jgottlieb@morrisoncohen.com) no later than **December 6, 2023 at 12 PM (Eastern Time) (“Objection Deadline”)**, setting forth the nature of the objection and the specific amount of fees or expenses the objecting party is contesting.

8. If no objections to the Ninth Fee Statement are received by the Objection Deadline, the Debtors shall pay MC 80% of the fees and 100% of the expenses identified in this Ninth Fee Statement.

9. To the extent a proper objection to this Ninth Fee Statement is received on or before the Objection Deadline by MC and the Notice Parties, the Debtors shall withhold payment of just that portion of this Ninth Fee Statement that the objection contests and promptly pay the remainder of the fees and expenses in the percentages set forth above pursuant to the terms of the Interim Compensation Order. To the extent such objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

[Text Continued On Following Page]

Dated: New York, New York
November 21, 2023

MORRISON COHEN LLP

By: /s/ Heath D. Rosenblat

Heath D. Rosenblat, Esq.

Jason P. Gottlieb, Esq.

909 Third Avenue, 27th Floor

New York, New York 10022

(212) 735-8600

hrosenblat@morrisoncohen.com

kgottlieb@morrisoncohen.com

*Special Litigation and Enforcement Counsel
for Debtors and Debtors-In-Possession*

EXHIBIT A

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Fee Summary for October 1, 2023 through October 31, 2023

<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to the NY Bar</u>	<u>Rate</u>	<u>Billed Hours</u>	<u>Billed Amount</u>
Gottlieb, Jason P.	Partner	Digital Assets	2002	\$1,200.00	24.9	\$29,880.00
Isaacs, Daniel C.	Partner	Digital Assets	2011	\$875.00	13.1	\$11,462.50
Rosenblat, Heath D.	Partner	Bankruptcy, Restructuring & Governance	2003	\$900.00	1.1	\$990.00
Mix, Michael	Partner	Digital Assets	2012	\$875.00	2.2	\$1,925.00
Siconolfi, Sally	Contract Attorney	Bankruptcy, Restructuring & Governance	2005	\$650.00	6.1	\$3,965.00
Roth, Will	Associate	Digital Assets	2017	\$700.00	23.3	\$16,310.00
Upadhyaya, Vani T.	Associate	Digital Assets	2020	\$580.00	9.5	\$5,510.00

<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to the NY Bar</u>	<u>Rate</u>	<u>Billed Hours</u>	<u>Billed Amount</u>
Knox, Tukisha	Paralegal	Bankruptcy, Restructuring & Governance	n/a	\$485.00	1.5	\$727.50
Schou, Sarah A.	Paralegal	Litigation	n/a	\$350.00	9.5	\$3,325.00
Yan, Ken	Litigation Support Specialist	Litigation	n/a	\$330.00	0.8	\$264.00

EXHIBIT B

Fee Summary by Project Category for October 1, 2023 through October 31, 2023

<u>Matter/Description</u>	<u>Hours</u>	<u>Amount</u>
B110 Case Administration	10.1	\$8,750.00
B160 Fee/Employment Applications	3.0	\$2,050.00
B190 Litigation	78.9	\$63,559.00
Total	92.0	\$74,359.00

EXHIBIT C

Time Records for October 1, 2023 through October 31, 2023



030986-0001	GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO BANKRUPTCY MATTER	DATE: 11/15/23 INVOICE #: 2221356
ARIANNA PRETTO-SAKMANN GENESIS GLOBAL TRADING, INC. 250 PARK AVENUE SOUTH, 5TH FLOOR NEW YORK, NY 10003		TAXPAYER IDENTIFICATION NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110		CASE ADMINISTRATION		
10/16/23	HDR	E-MAILS TO/FROM S. SICONOLFI REGARDING OPEN CASE MATTERS	0.20	180.00
10/17/23	SSI	EMAILS TO AND FROM TEAM REGARDING OPEN MATTERS AND FOLLOW-UP ON SAME	0.80	520.00
10/18/23	MIM	COMMENT ON OPEN MATTERS AND SEND STATUS EMAILS TO TEAM ON SAME	0.50	437.50
10/19/23	HDR	REVIEW OF CASE MATTERS AND E-MAILS TO/FROM J. GOTTLIEB AND M. MIX REGARDING SAME	0.20	180.00
10/23/23	SSI	FURTHER DISCUSSIONS WITH TEAM MEMBERS REGARDING LITIGATIONS AND STATUS THEREOF	0.90	585.00
10/23/23	SSI	REVIEW OPEN LITIGATION MATTERS AND CONSIDER STATUS OF THEM AND WORKI WITH TEAM	1.60	1,040.00
10/24/23	SSI	EMAILS AND CALLS WITH T. KNOX AND H. ROSENBLAT SEPERATELY ON STATUS OF MATTERS	0.20	130.00
10/24/23	TMK	TELEPHONE CALL WITH S. SICONOLFI REGARDING UPCOMING FILING (.1); REVIEW, PREPARE AND FILE DOCUMENTS (.7); EMAIL TO SERVICE AGENT TO EFFECTUATE SERVICE (.1); CIRCULATE OBJECTION DEADLINE TO TEAM (.1); PREPARE AND FILE CERTIFICATE OF SERVICE OF SAME (.5)	1.50	727.50
10/30/23	HDR	REVIEW OF FILES AND E-MAILS TO/FROM A. PRETTO-SAKAMAN REGARDING SAME (.2); DISCUSS SAME WITH J. GOTTLIEB AND S. SICONOLFI (.1).	0.30	270.00
TOTAL TASK CODE B110		CASE ADMINISTRATION	6.20	4,070.00
TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS		
10/17/23	SSI	DRAFT, REVIEW, AND REVISE SEPTEMBER FEE STATEMENT AND EXHIBITS THERETO	2.60	1,690.00
10/24/23	HDR	REVIEW OF MONTHLY FEE STATEMENT FOR FILING (.2); TELEPHONE CALLS AND E-MAILS TO/FROM S. SICONOLFI AND OTHERS REGARDING SAME (.2).	0.40	360.00
TOTAL TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS	3.00	2,050.00



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 11/15/23
INVOICE #: 2221356

GRAND TOTAL FEES	9.20	6,120.00
TOTAL FEES SERVICES	\$	6,120.00

TASK SUMMARY BY TIMEKEEPER

INIT	TIMEKEEPER NAME	HOURS	VALUE
B110	CASE ADMINISTRATION		
HDR	HEATH D. ROSENBLAT	0.70	630.00
MIM	MICHAEL MIX	0.50	437.50
SSI	SALLY SICONOLFI	3.50	2,275.00
TMK	TUKISHA KNOX	1.50	727.50
SUBTOTAL	B110 CASE ADMINISTRATION	6.20	4,070.00
B160	FEE/EMPLOYMENT APPLICATIONS		
HDR	HEATH D. ROSENBLAT	0.40	360.00
SSI	SALLY SICONOLFI	2.60	1,690.00
SUBTOTAL	B160 FEE/EMPLOYMENT APPLICATIONS	3.00	2,050.00
TOTAL FEES		9.20	6,120.00

TASK SUMMARY FOR FEES:

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	6.20	4,070.00
B160	FEE/EMPLOYMENT APPLICATIONS	3.00	2,050.00
TOTAL FEES		9.20	6,120.00

TIMEKEEPER SUMMARY

INIT	TIMEKEEPER NAME	HOURS	AMOUNT
HDR	HEATH D. ROSENBLAT	1.10	990.00
MIM	MICHAEL MIX	0.50	437.50
SSI	SALLY SICONOLFI	6.10	3,965.00
TMK	TUKISHA KNOX	1.50	727.50
TOTAL FEES		9.20	6,120.00

TOTAL BALANCE DUE FOR THIS PERIOD \$ 6,120.00



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 11/15/23
INVOICE #: 2221356

WIRE INSTRUCTIONS

Bank Name: HSBC

Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number



030983 GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23
INVOICE #: 2221349

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

FEE SUMMARY BY MATTER

MATTER NAME	CLIENT-MATTER #	HOURS	\$ AMOUNT
[REDACTED]	030983-0001	60.20	48,339.00
[REDACTED]	030983-0005	0.40	350.00
[REDACTED]	030983-0017	22.20	19,550.00
GRAND TOTALS		82.80	\$ 68,239.00

FEE SUMMARY BY TIMEKEEPER

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	24.90	29,880.00
ISAACS, DANIEL C.	PARTNER	875.00	13.10	11,462.50
MIX, MICHAEL	PARTNER	875.00	1.70	1,487.50
ROTH, WILL	ASSOCIATE	700.00	23.30	16,310.00
UPADHYAYA, VANI T.	ASSOCIATE	580.00	9.50	5,510.00
SCHOU, SARAH	PARALEGALS	350.00	9.50	3,325.00
YAN, KEN (JIAN-QING)	PARALEGALS	330.00	0.80	264.00
GRAND TOTALS			82.80	\$ 68,239.00



Morrison Cohen

030983 GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23
INVOICE #: 2221349

FEE SUMMARY BY TASK CODE & TIMEKEEPER

FEE TASK CODE: B110 / Case Administration

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	3.90	4,680.00
TOTALS FOR TASK CODE: B110 Case Administration			3.90	4,680.00

FEE TASK CODE: B190 / Litigation

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	21.00	25,200.00
ISAACS, DANIEL C.	PARTNER	875.00	13.10	11,462.50
MIX, MICHAEL	PARTNER	875.00	1.70	1,487.50
ROTH, WILL	ASSOCIATE	700.00	23.30	16,310.00
UPADHYAYA, VANI T.	ASSOCIATE	580.00	9.50	5,510.00
SCHOU, SARAH	PARALEGALS	350.00	9.50	3,325.00
YAN, KEN (JIAN-QING)	PARALEGALS	330.00	0.80	264.00
TOTALS FOR TASK CODE: B190 Litigation			78.90	63,559.00

GRAND TOTALS 82.80 \$ **68,239.00**

SUMMARY OF DISBURSEMENTS BY MATTER & TYPE

MATTER NAME	CLIENT-MATTER #	TYPE	\$ AMOUNT
	030983-0017	DATABASE SEARCH	17.60
	030983-0017	ELECTRONIC DATA STORAGE	32.00
GRAND TOTALS			\$ 49.60

TOTAL BALANCE DUE FOR THIS PERIOD\$ 68,288.60



030983-0001

GENESIS GLOBAL HOLDCO, LLC
[REDACTED] L

DATE: 11/15/23
INVOICE #: 2221349

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110 Case Administration				
10/12/23	JXG	CALL WITH A. PRETTO-SAKMANN AND CLEARY REGARDING STATUS UPDATE	0.70	840.00
10/19/23	JXG	EMAILS WITH A. PRETTO-SAKMANN & CLEARY COUNSEL REGARDING FILED REGULATOR [REDACTED] & STRATEGY GOING FORWARD (.3); CALL WITH CLIENT (D. ISLIM AND A. PRETTO-SAKMANN) AND CLEARY REGARDING STRATEGY AND PRESS STATEMENT (1.1); EMAIL TO G. TAPALAGA REGARDING SERVICE (.2); FOLLOW-UP CALL WITH CLIENT & CLEARY REGARDING STRATEGY (.9); ATTENTION TO PRESS STATEMENTS (.2)	2.70	3,240.00
TOTAL TASK CODE B110 Case Administration			3.40	4,080.00
TASK CODE B190 Litigation				
10/01/23	VTU	WORK ON DOCUMENT REVIEW FOR UPCOMING PRODUCTION	1.50	870.00
10/02/23	VTU	EMAILS WITH D. ISAACS, K. YAN REGARDING FINALIZING DOCUMENT PRODUCTION	0.20	116.00
10/02/23	DCI	REVIEW AND PREPARE PRODUCTION TO REGULATOR	0.40	350.00
10/02/23	KJY	REVIEW AND UPDATE PRODUCTION OF RESPONSIVE DOCUMENTS	0.80	264.00
10/02/23	SAS	REVIEW AND UPDATE AND CODE PRIVILEGE LOG FOR SUBMISSION	4.00	1,400.00
10/03/23	VTU	REVIEW AND REVISE PRIVILEGE LOG	1.80	1,044.00
10/06/23	VTU	REVIEW AND RESPOND TO EMAILS WITH REGULATOR AND K. YAN REGARDING METADATA OF DOCUMENT PRODUCTION (.2); DISCUSS PRIVILEGE LOGS WITH D. ISAACS (.2)	0.40	232.00
10/06/23	DCI	CORRESPOND WITH REGULATOR REGARDING DOCUMENT PRODUCTIONS	0.30	262.50
10/09/23	DCI	EMAILS AND CALLS WITH CLEARY REGARDING [REDACTED] AND RESPONSE TO REGULATORS	0.50	437.50



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
10/09/23	VTU	EMAILS WITH CGSH REGARDING UPCOMING PRODUCTIONS	0.20	116.00
10/10/23	VTU	EMAILS WITH S. SCHOU REGARDING PRIVILEGE LOG	0.20	116.00
10/11/23	DCI	CALLS AND EMAILS WITH CLEARY REGARDING STRATEGY (.7); CORRESPOND. WITH REGULATOR ON SAME (.4)	1.10	962.50
10/11/23	JXG	CALL WITH CLEARY REGARDING REGULATOR UPDATE AND STRATEGY	0.50	600.00
10/12/23	DCI	CONF. WITH CLIENT/CLEARY REGARDING STRATEGY	1.00	875.00
10/16/23	JXG	EMAIL WITH D. ISAACS AND CLEARY REGARDING REGULATOR MEETING	0.20	240.00
10/16/23	DCI	CALLS AND EMAILS. WITH CLEARY REGARDING PRESENTATION TO REGULATOR (.4); CORR. WITH REGULATOR REGARDING SAME (.2); REVIEW AND REVISE PRESENTATION (.2)	0.80	700.00
10/17/23	SAS	RE-CODING DOCUMENT NUMBERS FOR REGULATOR TALKING POINTS DRAFT	5.50	1,925.00
10/17/23	VTU	WORK ON DRAFTING TALKING POINTS FOR DISCUSSION WITH REGULATOR	2.10	1,218.00
10/18/23	VTU	WORK ON DRAFTING TALKING POINTS FOR DISCUSSION WITH REGULATOR	1.30	754.00
10/18/23	WIR	PREPARE FOR AND CALL WITH CLEARY TEAM AND J. GOTTLIEB REGARDING EXPECTED REGULATOR ACTION (.8); PREPARE LETTER TO REGULATOR (1.1); AND FOLLOW-UP ON OPEN MATTERS (.7)	2.60	1,820.00
10/18/23	JXG	EMAIL WITH CLEARY TEAM REGARDING TALKING POINTS (.2); CONFERENCE CALL WITH REGULATOR REGARDING SAME (.9); SEPARATE CALL WITH REGULATOR REGARDING NOTICE OF LITIGATION (.6); PREPARE FOR AND CALL WITH CLEARY AND W. ROTH AND FOLLOW-UP (.8); PREP FOR CALL WITH REGULATOR [REDACTED] (.5); EMAIL WITH W. ROTH REGARDING OUTLINE FOR CALL WITH [REDACTED] (.2); CALL WITH [REDACTED] (.4); EMAIL WITH COUNSEL REGARDING NOTES [REDACTED] CALL (.2); EMAILS WITH CLIENTS AND CLEARY REGARDING STRATEGY (.2); EMAIL WITH MOCO TEAM REGARDING STRATEGY (.2)	4.20	5,040.00
10/19/23	MIM	EMAILS WITH J. GOTTLIEB REGARDING COMPLAINT (.30); REVIEW COMPLAINT (1.40)	1.70	1,487.50
10/19/23	WIR	REVIEW AND ANALYZE COMPLAINT	3.30	2,310.00
10/19/23	DCI	REVIEW AND CONSIDER REGULATOR COMPLAINT	0.70	612.50
10/20/23	WIR	ATTENTION TO AND RESPOND TO CORRESPONDENCE REGARDING CASE PLANNING AND STRATEGY	1.40	980.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
10/20/23	JXG	EMAIL WITH [REDACTED] (.1); EMAIL WITH CLIENT REGARDING [REDACTED] REACHOUT (.2); EMAIL WITH CLEARY REGARDING STRATEGY (.2)	0.50	600.00
10/21/23	JXG	CALL WITH S. O'NEAL (CLEARY) REGARDING CASE (.5); CALL WITH [REDACTED] REGARDING SAME (.1); EMAIL WITH CLIENT REGARDING SAME (.2)	0.80	960.00
10/22/23	JXG	EMAIL WITH CLIENT REGARDING REGULATOR STRATEGY (.2); EMAIL WITH REGULATOR(.1); EMAIL WITH [REDACTED] ([REDACTED]) (.1); EMAIL WITH OTHER CO-COUNSEL (.1)	0.50	600.00
10/23/23	JXG	JOINT DEFENSE COUNSEL CALL (.4); EMAIL WITH TEAM AND CLEARY REGARDING REGULATOR [REDACTED] CALL (.2); EMAIL WITH [REDACTED] COUNSEL (.2)	0.80	960.00
10/23/23	WIR	CORRESPONDENCE AND FOLLOW-UP WITH TEAM AND CLEARY UP REGARDING REGULATOR CALL	0.30	210.00
10/24/23	WIR	PREPARE FOR (1.5) AND ATTEND [REDACTED] AND REGULATOR CALLS (.8)	2.30	1,610.00
10/24/23	VTU	REVIEW PRIOR NOTES AND MEMOS (.8) AND DISCUSS DOCUMENT COLLECTION WITH JG, CGSH (.3)	1.10	638.00
10/24/23	JXG	CALL WITH CLEARY REGARDING CASE AND FOLLOW-UP ON SAME (.7); CALL WITH REGULATOR (.9); EMAIL WITH W. ROTH AND CLEARY TEAM (.4)	2.00	2,400.00
10/25/23	JXG	EMAIL WITH CLIENT REGARDING [REDACTED] REGULATOR [REDACTED] (.2); CALL WITH REGULATOR(.8); EMAIL WITH CLEARY TEAM REGARDING RECAP OF REGULATOR CALL (.2)	1.20	1,440.00
10/25/23	WIR	CALLS REGARDING SETTLEMENT NEGOTIATIONS WITH REGULATOR	1.20	840.00
10/25/23	DCI	REVIEW MEMO REGARDING DISCUSSIONS WITH REGULATOR REGARDING SETTLEMENT	0.40	350.00
10/25/23	DCI	REVIEW [REDACTED] REGULATOR REQUEST	0.30	262.50
10/26/23	WIR	CALLS WITH REGULATOR AND J. GOTTLIEB (.8) AND [REDACTED] GROUP AND J. GOTTLIEB REGARDING POTENTIAL SETTLEMENT (.6); WORK ON POTENTIAL SETTLEMENT (.8)	2.20	1,540.00
10/26/23	JXG	CALL WITH CLEARY AND W. ROTH (.6); CALL WITH REGULATOR AND W. ROTH (.8); EMAIL WITH CLEARY REGARDING FOLLOW-UP (.2); REACH OUT TO [REDACTED] REGARDING [REDACTED] ISSUED TO GENESIS (.2)	1.80	2,160.00
10/27/23	JXG	CALL WITH REGULATOR(.6); PREP FOR SAME (.3); EMAIL WITH [REDACTED] E COUNSEL REGARDING RESPONSES (.2); EMAIL WITH [REDACTED] (.2)	1.30	1,560.00
10/30/23	VTU	EMAILS WITH CGSH, CDS REGARDING DOCUMENT PRODUCTION	0.70	406.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
10/30/23	WIR	CORRESPONDENCE REGARDING REGULATOR SETTLEMENT DEVELOPMENTS	0.20	140.00
10/30/23	JXG	CALL WITH [REDACTED] REGULATOR(.4); UPDATE EMAIL WITH CLIENTS REGARDING CALL WITH [REDACTED] REGULATOR(.2); CALL WITH REGULATOR(.4); EMAIL WITH CLIENTS REGARDING CALL WITH REGULATOR(2); CALL WITH R. ZUTSHI (CLEARY) REGARDING CALL WITH REGULATOR AND STRATEGY(.3); EMAIL WITH CLIENT AND CLEARY REGARDING STATUS(.2)	1.70	2,040.00
10/31/23	JXG	[REDACTED] CALL(.1); FOLLOW UP EMAIL WITH A. PRETTO-SAKMANN REGARDING CALL WITH REGULATOR(.2); EMAIL WITH CLIENT & CLEARY REGARDING STATUS ISSUES(.2)	0.50	600.00
10/31/23	WIR	ATTEND [REDACTED] CALL(.1) AND FOLLOW-UP WITH RELATED CORRESPONDENCE(.2)	0.30	210.00
TOTAL TASK CODE B190 Litigation			56.80	44,259.00
TOTAL FEES SERVICES			\$	48,339.00
TOTAL BALANCE DUE FOR THIS PERIOD			\$	48,339.00

TIMEKEEPER SUMMARY

ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	19.40	1,200.00	23,280.00
DANIEL C. ISAACS	5.50	875.00	4,812.50
MICHAEL MIX	1.70	875.00	1,487.50
WILLIAM ROTH	13.80	700.00	9,660.00
VANI T. UPADHYAYA	9.50	580.00	5,510.00
SARAH SCHOU	9.50	350.00	3,325.00
KEN (JIAN-QING) YAN	0.80	330.00	264.00
TOTAL FEES	60.20		48,339.00
TOTAL BALANCE DUE FOR THIS PERIOD			\$ 48,339.00



030983-0005

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B190 Litigation				
10/02/23	DCI	PREPARE PRODUCTION TO REGULATOR	0.40	350.00
		TOTAL TASK CODE B190 Litigation	0.40	350.00
		TOTAL FEES SERVICES	\$	350.00
		TOTAL BALANCE DUE FOR THIS PERIOD	\$	350.00

TIMEKEEPER SUMMARY

ATTORNEY	HOURS	RATE	VALUE
DANIEL C. ISAACS	0.40	875.00	350.00
TOTAL FEES	0.40		350.00

TOTAL BALANCE DUE FOR THIS PERIOD **\$ 350.00**



030983-0017

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110 Case Administration				
10/27/23	JXG	CALL WITH REGULATOR (.3); EMAILS WITH CLIENTS REGARDING SETTLEMENT TERMS UPDATE (.2)	0.50	600.00
TOTAL TASK CODE B110 Case Administration			0.50	600.00
TASK CODE B190 Litigation				
10/04/23	WIR	DRAFT INITIAL DISCOVERY DOCUMENTS INCLUDING REQUESTS AND DISCLOSURES	1.00	700.00
10/05/23	WIR	ATTENTION TO DRAFTING DISCOVERY ITEMS	1.80	1,260.00
10/05/23	JXG	EMAIL WITH W. ROTH REGARDING INITIAL DISCLOSURES (.1); EMAIL WITH D. ISAACS & CLIENTS REGARDING LITIGATION UPDATE (.1)	0.20	240.00
10/05/23	DCI	DRAFT/REVISE INITIAL DISCLOSURES	1.50	1,312.50
10/09/23	DCI	REVISE INITIAL DISCLOSURES (.8); CORR. WITH CLIENT REGARDING SAME (.3)	1.10	962.50
10/09/23	WIR	ATTENTION TO AND WORK ON DRAFTING INITIAL DISCOVERY PAPERS	0.80	560.00
10/09/23	JXG	EMAIL WITH D. ISAACS REGARDING INITIAL DISCLOSURES	0.20	240.00
10/11/23	WIR	ATTENTION TO WORKING ON INITIAL DISCOVERY MATTERS	1.00	700.00
10/11/23	DCI	CORR. WITH CLIENT REGARDING INITIAL DISCLOSURES.	0.20	175.00
10/11/23	JXG	EMAIL WITH TEAM REGARDING INITIAL DISCLOSURES AND STRATEGY	0.20	240.00
10/12/23	JXG	EMAIL WITH E. REILLY REGARDING INITIAL DISCLOSURES (.1); EMAIL WITH CLIENTS REGARDING SAME (.1)	0.20	240.00
10/12/23	DCI	CORR. WITH REGULATOR REGARDING INITIAL DISCLOSURES (.3); PREPARE FOR AND CALL WITH CLIENT AND W. ROTH REGARDING SAME (1.1); CORR. WITH CLIENT REGARDING SAME (.3).	1.70	1,487.50
10/12/23	WIR	PREPARE FOR AND ATTEND CLIENT CALL WITH D. ISAACS REGARDING INITIAL DISCLOSURES	1.30	910.00

030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
10/13/23	JXG	EMAIL WITH D. ISAACS REGARDING E. REILLY'S LETTER (.1); EMAIL WITH CLIENTS REGARDING SAME (.1)	0.20	240.00
10/13/23	DCI	ATTENTION TO DOCUMENT PRESERVATION (.3); CORR. WITH REGULATOR AND CLIENT REGARDING SAME (.7); CORR. WITH REGULATOR REGARDING INITIAL DISCLOSURES DEADLINE (.3).	1.30	1,137.50
10/16/23	JXG	EMAIL WITH D. ISAACS AND W. ROTH REGARDING INITIAL DISCLOSURES	0.10	120.00
10/16/23	WIR	WORK ON PREPARATION OF DISCOVERY REQUESTS	1.30	910.00
10/18/23	JXG	EMAIL WITH W. ROTH REGARDING PRE-MOTION CONFERENCE MATERIALS (.2); PREP FOR COURT CONFERENCE (.8); COURT CONFERENCE (.7); UPDATE EMAIL WITH CLIENTS REGARDING DENIED MOTION AND STRATEGY (.2); EMAIL WITH W. ROTH REGARDING CONFERENCE NOTES (.1); ATTENTION TO LETTER TO REGULATOR AND RELATED EMAIL (.7)	2.70	3,240.00
10/18/23	WIR	PREPARE FOR (.3) AND ATTEND PRE-MOTION CONFERENCE WITH JUDGE [REDACTED] RE DISCOVERY STAY (.7)	1.00	700.00
10/19/23	JXG	EMAIL WITH W. ROTH REGARDING INITIAL DISCLOSURES SERVICE (.2); ATTENTION TO REGULATOR AND [REDACTED] INITIAL DISCLOSURES (.5)	0.70	840.00
10/19/23	WIR	WORK ON CASE UPDATES (.2); FINALIZE AND SERVE INITIAL DISCLOSURES (.5)	0.70	490.00
10/19/23	DCI	REVIEW INITIAL DISCLOSURES	0.70	612.50
10/24/23	WIR	WORK ON OPEN DISCOVERY ITEMS	0.40	280.00
10/25/23	WIR	CORRESPONDENCE WITH CLEARY TEAM AND CLIENT AND J. GOTTLIEB RE SETTLEMENT	0.20	140.00
10/25/23	DCI	ANALYSIS REGARDING POTENTIAL RESOLUTION OF MATTER	0.30	262.50
10/25/23	JXG	CALL WITH S. O'NEAL REGARDING STATUS (.2); DISCUSSION WITH CLEARY TEAM REGARDING POTENTIAL SETTLEMENT OFFER (.2); EMAIL WITH CLIENT REGARDING SAME (.1)	0.50	600.00
10/27/23	DCI	REVIEW REGULATOR PROPOSED DISCOVERY PLAN	0.40	350.00
TOTAL TASK CODE B190 Litigation			21.70	18,950.00
TOTAL FEES SERVICES			\$	19,550.00

DISBURSEMENTS:	VALUE
DATABASE SEARCH	17.60
ELECTRONIC DATA STORAGE	32.00
TOTAL DISBURSEMENTS	\$ 49.60

030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

**TOTAL BALANCE DUE FOR THIS
PERIOD**

\$ 19,599.60

TIMEKEEPER SUMMARY

	HOURS	RATE	VALUE
JASON GOTTLIEB	5.50	1,200.00	6,600.00
DANIEL C. ISAACS	7.20	875.00	6,300.00
WILLIAM ROTH	9.50	700.00	6,650.00
TOTAL FEES	22.20		19,550.00

TOTAL BALANCE DUE FOR THIS PERIOD **\$ 19,599.60**

WIRE INSTRUCTIONS

Bank Name: HSBC

Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number



030983-0005

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B190 Litigation				
10/02/23	DCI	PREPARE PRODUCTION TO REGULATOR	0.40	350.00
		TOTAL TASK CODE B190 Litigation	0.40	350.00
		TOTAL FEES SERVICES	\$	350.00
		TOTAL BALANCE DUE FOR THIS PERIOD	\$	350.00

ATTORNEY	HOURS	RATE	VALUE
DANIEL C. ISAACS	0.40	875.00	350.00
TOTAL FEES	0.40		350.00
TOTAL BALANCE DUE FOR THIS PERIOD			\$ 350.00



030983-0005

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
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		TOTAL TASK CODE B190 Litigation	0.40	350.00
		TOTAL FEES SERVICES	\$	350.00
		TOTAL BALANCE DUE FOR THIS PERIOD	\$	350.00

ATTORNEY	HOURS	RATE	VALUE
DANIEL C. ISAACS	0.40	875.00	350.00
TOTAL FEES	0.40		350.00
TOTAL BALANCE DUE FOR THIS PERIOD			\$ 350.00



030983-0017

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
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10/27/23	JXG	CALL WITH REGULATOR (.3); EMAILS WITH CLIENTS REGARDING SETTLEMENT TERMS UPDATE (.2)	0.50	600.00
TOTAL TASK CODE B110 Case Administration			0.50	600.00
TASK CODE B190 Litigation				
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10/05/23	WIR	ATTENTION TO DRAFTING DISCOVERY ITEMS	1.80	1,260.00
10/05/23	JXG	EMAIL WITH W. ROTH REGARDING INITIAL DISCLOSURES (.1); EMAIL WITH D. ISAACS & CLIENTS REGARDING LITIGATION UPDATE (.1)	0.20	240.00
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10/09/23	JXG	EMAIL WITH D. ISAACS REGARDING INITIAL DISCLOSURES	0.20	240.00
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10/11/23	JXG	EMAIL WITH TEAM REGARDING INITIAL DISCLOSURES AND STRATEGY	0.20	240.00
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10/12/23	WIR	PREPARE FOR AND ATTEND CLIENT CALL WITH D. ISAACS REGARDING INITIAL DISCLOSURES	1.30	910.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

FOR PROFESSIONAL SERVICES RENDERED AS OF OCTOBER 31, 2023

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10/25/23	DCI	ANALYSIS REGARDING POTENTIAL RESOLUTION OF MATTER	0.30	262.50
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10/27/23	DCI	REVIEW REGULATOR PROPOSED DISCOVERY PLAN	0.40	350.00
TOTAL TASK CODE B190 Litigation			21.70	18,950.00
TOTAL FEES SERVICES			\$	19,550.00

DISBURSEMENTS:	VALUE
DATABASE SEARCH	17.60
ELECTRONIC DATA STORAGE	32.00
TOTAL DISBURSEMENTS	\$ 49.60

030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 11/15/23

INVOICE #: 2221349

TOTAL BALANCE DUE FOR THIS PERIOD

\$ 19,599.60

ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	5.50	1,200.00	6,600.00
DANIEL C. ISAACS	7.20	875.00	6,300.00
WILLIAM ROTH	9.50	700.00	6,650.00
TOTAL FEES	22.20		19,550.00

TOTAL BALANCE DUE FOR THIS PERIOD

\$ 19,599.60

WIRE INSTRUCTIONS

Bank Name: HSBC

Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number

EXHIBIT D

Summary of Expenses for October 1, 2023 through October 31, 2023

Expense Category	Total Expenses
Relativity Hosting Fee	\$32.00
Pacer	17.60
Grand Total Expenses	\$49.60

EXHIBIT E

Summary of Expenses for October 1, 2023 through October 31, 2023

Relativity Hosting Fee

8/31/2023 Relativity Hosting October 2023 – 030983-0017 - \$32.00

Pacer

10/31/2023 Pacer Search Charges October 2023 – 030983-0017 - \$17.60

Objection Deadline: January 4, 2023 at 12PM (Eastern Time)

MORRISON COHEN LLP
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Jason P. Gottlieb, Esq.
Heath D. Rosenblat, Esq.

Special Litigation and Enforcement Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF TENTH FEE STATEMENT THAT OCCURRED IN
THE THIRD FEE APPLICATION PERIOD OF MORRISON
COHEN LLP FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR
THE PERIOD FROM NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:	Morrison Cohen LLP
Authorized to Provide Services to:	Genesis Global Holdco, LLC, <i>et al.</i>
Date of Retention:	An entered order [ECF No. 106], dated February 24, 2023, authorizing retention <i>nunc pro tunc</i> to the Petition Date (<i>i.e.</i> , January 19, 2023), as applicable for each Debtor.
Period for which Compensation and Expenses are Sought:	11/01/2023 through 11/30/2023 Monthly Fee Statement for November 2023
Amount of Compensation Requested:	\$24,949.00

¹ The debtors and debtors-in-possession (collectively, “**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, New York 10003.

Less 20% Holdback:	\$4,989.80
Compensation Net of Holdbacks:	\$19,959.20
Amount of Expense Requested:	\$16.00
Total Compensation and Expenses (Net of Holdbacks):	\$19,975.20

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 101] (“**Interim Compensation Order**”), dated February 24, 2023, Morrison Cohen LLP (“**MC**”) hereby submits this Tenth Fee Statement for the month of November 2023 (this “**Tenth Fee Statement**”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtors for the period November 1, 2023 through and including November 30, 2023 (“**Ninth Monthly Fee Period**”). By this Tenth Fee Statement, and after taking into account certain voluntary reductions, MC seeks payment in the amount of \$19,975.20, which comprises (a) 80% of the total amount (\$24,949.00) of compensation sought for actual and necessary services rendered during the Ninth Monthly Fee Period and (b) reimbursement in the amount of \$16.00, which comprises 100% of actual and necessary expenses incurred in accordance with such services.

SERVICES RENDERED AND EXPENSES INCURRED

1. Attached hereto as **Exhibit A** is a summary of MC’s professionals by individual, setting forth the: (a) name and title of each individual who provided services for the Ninth Monthly Fee Period; (b) aggregate hours spent by each individual; (c) MC’s current hourly billing rate for each individual that provided services in the Ninth Monthly Fee Period; (d) amount of fees earned by each MC professional; and (d) year of admittance and jurisdiction for each attorney that is included on this Tenth Fee Statement. The blended hourly billing rate of MC’s timekeepers in the Ninth Monthly Fee Period is approximately \$851.50/hour.

2. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought, by project category for the Ninth Monthly Fee Period.

3. Attached hereto as **Exhibit C** is itemized time records of MC's professionals for the Ninth Monthly Fee Period and summary materials related thereto.

4. Attached hereto as **Exhibit D** is a summary of expenses incurred and reimbursement of expenses sought, by expense type, for the Ninth Monthly Fee Period.

5. Attached hereto as **Exhibit E** is an itemized record of all expenses for the Ninth Monthly Fee Period.

NOTICE OF OBJECTION PROCEDURES

6. Consistent with the terms of the Interim Compensation Order, notice of this Tenth Fee Statement shall be given by email, hand or overnight delivery upon the following parties ("**Notice Parties**"): (a) The Debtors c/o Genesis Global Holdco, LLC, Attn: Arianna Pretto-Sankman (e-mail: arianna@genesistrading.com); (b) Counsel to the Debtors, Cleary Gottlieb Steen & Hamilton, One Liberty Plaza, New York, New York 10006, Attn: Sean A. O'Neal, Esq., Jane VanLare, Esq. (e-mail: soneal@cgsh.com; jvanlare@cgsh.com); (c) The United States Trustee for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Suite 515, New York, New York 10004, Attn: Greg Zipes, Esq. (e-mail: greg.zipes@usdoj.gov); and (d) Counsel to the official committee of unsecured creditors, White & Case LLP, 1221 Avenue of the Americas, 49th Floor, New York, New York 10020, Attn: Philip Abelson and Michele Meises (e-mail: philip.abelson@whitecase.com; michele.meises@whitecase.com) and, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Gregory F. Pesce (e-mail: gregory.pesce@whitecase.com).

7. Objections to this Tenth Fee Statement, if any, must be served upon the Notice Parties, and by e-mail, hand, or overnight delivery, upon MC, 909 Third Avenue, 27th Floor, New York, New York 10022, Attn: Heath D. Rosenblat, Esq. and Jason Gottlieb, Esq. (e-mail: hrosenblat@morrisoncohen.com; jgottlieb@morrisoncohen.com) no later than **January 4, 2024 at 12 PM (Eastern Time) (“Objection Deadline”)**, setting forth the nature of the objection and the specific amount of fees or expenses the objecting party is contesting.

8. If no objections to the Tenth Fee Statement are received by the Objection Deadline, the Debtors shall pay MC 80% of the fees and 100% of the expenses identified in this Tenth Fee Statement.

9. To the extent a proper objection to this Tenth Fee Statement is received on or before the Objection Deadline by MC and the Notice Parties, the Debtors shall withhold payment of just that portion of this Tenth Fee Statement that the objection contests and promptly pay the remainder of the fees and expenses in the percentages set forth above pursuant to the terms of the Interim Compensation Order. To the extent such objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

[Text Continued On Following Page]

Dated: New York, New York
December 20, 2023

MORRISON COHEN LLP

By: /s/ Heath D. Rosenblat

Heath D. Rosenblat, Esq.

Jason P. Gottlieb, Esq.

909 Third Avenue, 27th Floor

New York, New York 10022

(212) 735-8600

hrosenblat@morrisoncohen.com

jgottlieb@morrisoncohen.com

*Special Litigation and Enforcement Counsel
for Debtors and Debtors-In-Possession*

EXHIBIT A

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Fee Summary for November 1, 2023 through November 30, 2023

<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to the NY Bar</u>	<u>Rate</u>	<u>Billed Hours</u>	<u>Billed Amount</u>
Gottlieb, Jason P.	Partner	Digital Assets	2002	\$1,200.00	10.0	\$12,000.00
Isaacs, Daniel C.	Partner	Digital Assets	2011	\$875.00	0.6	\$525.00
Rosenblat, Heath D.	Partner	Bankruptcy, Restructuring & Governance	2003	\$900.00	0.8	\$720.00
Siconolfi, Sally	Contract Attorney	Bankruptcy, Restructuring & Governance	2005	\$650.00	11.7	\$7,605.00
Roth, Will	Associate	Digital Assets	2017	\$700.00	5.2	\$3,640.00
Knox, Tukisha	Paralegal	Bankruptcy, Restructuring & Governance	n/a	\$485.00	0.9	\$436.50
Crawley, Brianna S.	Paralegal	Litigation	n/a	\$225.00	0.1	\$22.50

EXHIBIT B

Fee Summary by Project Category for November 1, 2023 through November 30, 2023

<u>Matter/Description</u>	<u>Hours</u>	<u>Amount</u>
B110 Case Administration	7.6	\$5,886.50
B160 Fee/Employment Applications	7.7	\$5,105.00
B190 Litigation	14.0	\$13,957.50
Total	29.3	\$24,949.00

EXHIBIT C

Time Records for November 1, 2023 through November 30, 2023



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 12/12/23
INVOICE #: 222515

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF NOVEMBER 30, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110		CASE ADMINISTRATION		
11/02/23	SSI	FOLLOW-UP WITH UP WITH TEAM MEMBERS ON STATUS OF OPEN LITIGATION ITEMS.	1.30	845.00
11/07/23	SSI	CONTINUED FOLLOW-UP AND ANALYSIS AND CONSIDERATION OF LITIGATION MATTERS	1.80	1,170.00
11/09/23	SSI	EMAILS AND CALLS WITH H. ROSENBLAT REGARDING OPEN MATTERS	0.40	260.00
11/09/23	HDR	REVIEW OF OPEN ISSUES IN CASE AND DISCUSS WITH S. SICONOLFI.	0.40	360.00
11/14/23	SSI	REVIEW FILINGS ON REVIEW AND ANALYSIS OF BANKRUPTCY DOCKET AND EMAILS INTERNALLY AND TO CLIENT ON SAME.	0.90	585.00
11/21/23	TMK	REVIEW, PREPARE AND FILE DOCUMENTS (.4) ; EMAIL TO EFFECTUATE SERVICE (.1); CIRCULATE OBJECTION DEADLINES TO TEAM (.1); PREPARE CERTIFICATE OF SERVICE (.3)	0.90	436.50
TOTAL TASK CODE B110		CASE ADMINISTRATION	5.70	3,656.50
TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS		
11/09/23	SSI	DRAFT, REVIEW, AND REVISE SECOND FEE APP	3.60	2,340.00
11/14/23	SSI	DISCUSSION WITH H. ROSENBLAT ON SECOND FEE APPLICATION (.2); AND FOLLOW-UP REGARDING SAME (.2)	0.40	260.00
11/14/23	HDR	REVIEW OF AND OFFICE CONFERENCE WITH S. SICONOLFI REGARDING SECOND FEE APPLICATION (.2); FOLLOW-UP REGARDING SAME (.2).	0.40	360.00
11/16/23	SSI	DRAFT, REVIEW, AND REVISE MONTHLY FEE STATEMENT AND EXHIBITS	3.30	2,145.00
TOTAL TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS	7.70	5,105.00
GRAND TOTAL FEES			13.40	8,761.50
TOTAL FEES SERVICES				\$ 8,761.50



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 12/12/23
INVOICE #: 2222515

TASK SUMMARY BY TIMEKEEPER

INIT	TIMEKEEPER NAME	HOURS	VALUE
B110	CASE ADMINISTRATION		
HDR	HEATH D. ROSENBLAT	0.40	360.00
SSI	SALLY SICONOLFI	4.40	2,860.00
TMK	TUKISHA KNOX	0.90	436.50
SUBTOTAL	B110 CASE ADMINISTRATION	5.70	3,656.50
B160	FEE/EMPLOYMENT APPLICATIONS		
HDR	HEATH D. ROSENBLAT	0.40	360.00
SSI	SALLY SICONOLFI	7.30	4,745.00
SUBTOTAL	B160 FEE/EMPLOYMENT APPLICATIONS	7.70	5,105.00
TOTAL FEES		13.40	8,761.50

TASK SUMMARY FOR FEES:

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	5.70	3,656.50
B160	FEE/EMPLOYMENT APPLICATIONS	7.70	5,105.00
TOTAL FEES		13.40	8,761.50

TIMEKEEPER SUMMARY

INIT	TIMEKEEPER NAME	HOURS	AMOUNT
HDR	HEATH D. ROSENBLAT	0.80	720.00
SSI	SALLY SICONOLFI	11.70	7,605.00
TMK	TUKISHA KNOX	0.90	436.50
TOTAL FEES		13.40	8,761.50

TOTAL BALANCE DUE FOR THIS PERIOD \$ 8,761.50

WIRE INSTRUCTIONS

Bank Name: HSBC
Bank Address: 452 Fifth Avenue
New York, NY 10018



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 12/12/23
INVOICE #: 2222515

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

SWIFT Code (Only for International Wire): MRMDUS33

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 12/12/23

INVOICE #: 222513

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF NOVEMBER 30, 2023

FEE SUMMARY BY MATTER

MATTER NAME	CLIENT-MATTER #	HOURS	\$ AMOUNT
[REDACTED]	030983-0001	9.50	9,400.00
[REDACTED]	030983-0017	6.40	6,787.50
GRAND TOTALS		15.90	\$ 16,187.50

FEE SUMMARY BY TIMEKEEPER

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	10.00	12,000.00
ISAACS, DANIEL C.	PARTNER	875.00	0.60	525.00
ROTH, WILL	ASSOCIATE	700.00	5.20	3,640.00
CRAWLEY, BRIANNA S.	PARALEGAL	225.00	0.10	22.50
GRAND TOTALS			15.90	\$ 16,187.50



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 12/12/23
INVOICE #: 2222513

FEE SUMMARY BY TASK CODE & TIMEKEEPER

FEE TASK CODE: B110 / Case Administration

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	1.80	2,160.00
ROTH, WILL	ASSOCIATE	700.00	0.10	70.00
TOTALS FOR TASK CODE: B110 Case Administration			1.90	2,230.00

FEE TASK CODE: B190 / Litigation

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	8.20	9,840.00
ISAACS, DANIEL C.	PARTNER	875.00	0.60	525.00
ROTH, WILL	ASSOCIATE	700.00	5.10	3,570.00
CRAWLEY, BRIANNA S.	PARALEGAL	225.00	0.10	22.50
TOTALS FOR TASK CODE: B190 Litigation			14.00	13,957.50

GRAND TOTALS	15.90	\$	16,187.50
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SUMMARY OF DISBURSEMENTS BY MATTER & TYPE

MATTER NAME	CLIENT-MATTER # TYPE	\$ AMOUNT
	030983-0017 ELECTRONIC DATA STORAGE	16.00
GRAND TOTALS		\$ 16.00

TOTAL BALANCE DUE FOR THIS PERIOD **\$ 16,203.50**



030983-0001

GENESIS GLOBAL HOLDCO, LLC

DATE: 12/12/23

INVOICE #: 222513

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF NOVEMBER 30, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110 Case Administration				
11/09/23	JXG	[REDACTED] (.6); EMAILS WITH A. PRETTO-SAKMANN REGARDING [REDACTED] (.2)	0.80	960.00
TOTAL TASK CODE B110 Case Administration			0.80	960.00
TASK CODE B190 Litigation				
10/27/23	WIR	COMMON INTEREST CALLS WITH CODEFENDANT'S COUNSEL (.2); CALL WITH REGULATOR (.6); AND FOLLOW-UP ON SAME (.2)	1.00	700.00
11/01/23	WIR	CORRESPONDENCE WITH TEAM REGARDING CASE UPDATES	0.30	210.00
11/01/23	JXG	EMAIL WITH A. PRETTO-SAKMANN REGARDING [REDACTED] (.2); EMAIL WITH JOINT DEFENSE COUNSEL ON SAME (.2); EMAIL WITH REGULATOR REGARDING SAME (.1)	0.50	600.00
11/02/23	JXG	EMAIL WITH A. SAENZ REGARDING [REDACTED] (.1); REVIEW OF [REDACTED] (.3); CALL WITH R. ZUTSHI (CLEARY) (.2)	0.60	720.00
11/02/23	WIR	COMMON INTEREST CALL WITH CODEFENDANT'S COUNSEL REGARDING [REDACTED]	0.60	420.00
11/04/23	JXG	EMAIL WITH CLEARY REGARDING [REDACTED]	0.20	240.00
11/06/23	WIR	COMMON INTEREST CALLS WITH CODEFENDANT'S COUNSEL REGARDING [REDACTED]	0.80	560.00
11/06/23	JXG	CALL WITH REGULATOR (.5); EMAIL WITH R. ZUTSHI REGARDING [REDACTED] (.2); EMAIL WITH A. PRETTO-SAKMANN REGARDING [REDACTED] (.2)	0.90	1,080.00
11/07/23	WIR	CORRESPONDENCE WITH TEAM REGARDING [REDACTED]	0.10	70.00
11/08/23	JXG	CALL WITH REGULATOR (.5); UPDATE EMAIL WITH A. PRETTO-SAKMANN [REDACTED] (.1)	0.60	720.00
11/09/23	WIR	CORRESPONDENCE UPDATES WITH TEAM REGARDING [REDACTED]	0.20	140.00



030983-0001 GENESIS GLOBAL HOLDCO, LLC

DATE: 12/12/23
INVOICE #: 2222513

FOR PROFESSIONAL SERVICES RENDERED AS OF NOVEMBER 30, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
11/14/23	WIR	CALL WITH REGULATOR AND COMMON INTEREST COUNSEL REGARDING [REDACTED]	0.50	350.00
11/14/23	JXG	CALL WITH REGULATOR (.5); EMAIL WITH W. ROTH REGARDING CALL NOTES (.1); EMAIL WITH CLIENT AND CLEARY (.1); EMAIL WITH REGULATOR REGARDING STIP (.1)	0.80	960.00
11/17/23	JXG	FOLLOW-UP ON SCHEDULING STIPULATION	0.20	240.00
11/17/23	WIR	CORRESPONDENCE WITH TEAM REGARDING [REDACTED]	0.10	70.00
11/20/23	JXG	CALL WITH CO-DEFENDANT COUNSEL REGARDING [REDACTED] 4); EMAIL WITH CLEARY REGARDING [REDACTED] (.3)	0.70	840.00
11/21/23	JXG	EMAIL WITH REGULATOR AND CLIENT REGARDING SCHEDULING STIPULATION	0.20	240.00
11/21/23	WIR	CORRESPONDENCE WITH TEAM REGARDING [REDACTED]	0.30	210.00
11/29/23	WIR	CORRESPONDENCE WITH TEAM WITH TEAM REGARDING [REDACTED]	0.10	70.00
TOTAL TASK CODE B190			8.70	8,440.00
Litigation TOTAL FEES SERVICES			\$	9,400.00
TOTAL BALANCE DUE FOR THIS PERIOD			\$	9,400.00

ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	5.50	1,200.00	6,600.00
WILLIAM ROTH	4.00	700.00	2,800.00
TOTAL FEES	9.50		9,400.00

TOTAL BALANCE DUE FOR THIS PERIOD **\$ 9,400.00**



030983-0017

GENESIS GLOBAL HOLDCO, LLC
[REDACTED]

DATE: 12/12/23

INVOICE #: 222513

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF NOVEMBER 30, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110 Case Administration				
11/13/23	WIR	CORRESPONDENCE WITH CO-DEFENDANTS REGARDING [REDACTED]	0.10	70.00
11/14/23	JXG	CALL WITH REGULATOR REGARDING [REDACTED] (.1); EMAIL WITH CLIENT (.1)	0.20	240.00
11/15/23	JXG	CALL WITH REGULATOR REGARDING [REDACTED] (.2); UPDATE EMAIL WITH A. PRETTO-SAKMANN REGARDING [REDACTED] (.2)	0.40	480.00
11/16/23	JXG	CALL WITH REGULATOR REGARDING [REDACTED] (.2); FOLLOW-UP EMAIL WITH CLIENTS (.2)	0.40	480.00
TOTAL TASK CODE B110 Case Administration			1.10	1,270.00
TASK CODE B190 Litigation				
11/02/23	JXG	EMAIL WITH REGULATOR (.1) REGARDING CASE; EMAIL WITH CLEARY ON SAME (.1)	0.20	240.00
11/03/23	JXG	EMAIL WITH REGULATOR REGARDING CASE (.1); EMAIL WITH CLEARY REGARDING CASE (.1); EMAIL WITH CO-COUNSEL REGARDING CASE (.1)	0.30	360.00
11/06/23	WIR	PREPARE FOR AND ATTEND COMMON INTEREST CALL WITH CO-DEFENDANT COUNSEL REGARDING [REDACTED]	0.30	210.00
11/06/23	JXG	CALL WITH CO-DEFENDANT COUNSEL REGARDING [REDACTED] (.2); FOLLOW-UP REGARDING SAME (.3)	0.50	600.00
11/07/23	JXG	EMAIL WITH W. ROTH REGARDING [REDACTED] (.3); FOLLOW UP CALL WITH A. PRETTO-SAKMANN REGARDING [REDACTED] (.2); CALL WITH S. O'NEAL (CLEARY) REGARDING REGULATOR CASE STATUS (.2)	0.80	960.00
11/07/23	WIR	CORRESPONDENCE WITH TEAM REGARDING [REDACTED]	0.30	210.00
11/09/23	JXG	CALL WITH REGULATOR REGARDING [REDACTED] (.2); EMAIL WITH CLIENT AND CLEARY REGARDING SAME (.2)	0.40	480.00



030983-0017 GENESIS GLOBAL HOLDCO, LLC

DATE: 12/12/23
INVOICE #: 2222513

FOR PROFESSIONAL SERVICES RENDERED AS OF NOVEMBER 30, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
11/13/23	JXG	EMAIL WITH CO-DEFENDANTS COUNSEL REGARDING [REDACTED]	0.10	120.00
11/17/23	JXG	CALL WITH REGULATOR (.2); EMAIL WITH CLIENTS AND CLEARY REGARDING SAME (.2); CALL WITH CLIENT REGARDING [REDACTED] (.5)	0.90	1,080.00
11/17/23	WIR	CORRESPONDENCE WITH TEAM REGARDING [REDACTED]	0.20	140.00
11/20/23	WIR	CORRESPONDENCE WITH TEAM REGARDING [REDACTED]	0.30	210.00
11/27/23	BSC	REVIEWED AND DOCKETED PROPOSED SCHEDULING ORDER.	0.10	22.50
11/27/23	JXG	EMAIL WITH REGULATOR COUNSEL REGARDING FILING OF SCHEDULING ORDER	0.10	120.00
11/28/23	JXG	CALL WITH REGULATOR COUNSEL AND EMAIL WITH CLIENT & CLEARY REGARDING SAME	0.20	240.00
11/29/23	DCI	ANALYZE DISCOVERY ORDER AND SCHEDULING REQUIREMENTS	0.60	525.00
TOTAL TASK CODE B190 Litigation			5.30	5,517.50
TOTAL FEES SERVICES			\$	6,787.50

DISBURSEMENTS:	VALUE
ELECTRONIC DATA STORAGE	16.00
TOTAL DISBURSEMENTS	\$ 16.00
TOTAL BALANCE DUE FOR THIS PERIOD	\$ 6,803.50

ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	4.50	1,200.00	5,400.00
DANIEL C. ISAACS	0.60	875.00	525.00
WILLIAM ROTH	1.20	700.00	840.00
BRIANNA S. CRAWLEY	0.10	225.00	22.50
	6.40		6,787.50

TOTAL FEES
TOTAL BALANCE DUE FOR THIS PERIOD **\$ 6,803.50**



Morrison Cohen

030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 12/12/23

INVOICE #: 222513

WIRE INSTRUCTIONS

Bank Name: HSBC

Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

SWIFT Code (Only for International Wire): MRMDUS33

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number

EXHIBIT D

Summary of Expenses for November 1, 2023 through November 30, 2023

Expense Category	Total Expenses
Relativity Hosting Fee	\$16.00
Grand Total Expenses	\$16.00

EXHIBIT E

Summary of Expenses for November 1, 2023 through November 30, 2023

Relativity Hosting Fee

11/30/2023 Relativity Hosting November 2023 – 030983-0017 - \$16.00

Objection Deadline: February 6, 2024 at 12PM (Eastern Time)

MORRISON COHEN LLP
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Jason P. Gottlieb, Esq.
Heath D. Rosenblat, Esq.

Special Litigation and Enforcement Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF ELEVENTH FEE STATEMENT THAT OCCURRED IN
THE THIRD FEE APPLICATION PERIOD OF MORRISON
COHEN LLP FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR
THE PERIOD FROM DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

Name of Applicant:	Morrison Cohen LLP
Authorized to Provide Services to:	Genesis Global Holdco, LLC, <i>et al.</i>
Date of Retention:	An entered order [ECF No. 106], dated February 24, 2023, authorizing retention <i>nunc pro tunc</i> to the Petition Date (<i>i.e.</i> , January 19, 2023), as applicable for each Debtor.
Period for which Compensation and Expenses are Sought:	12/01/2023 through 12/31/2023 Monthly Fee Statement for December 2023
Amount of Compensation Requested:	\$16,676.50

¹ The debtors and debtors-in-possession (collectively, “**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, New York 10003.

Less 20% Holdback:	\$3,335.30
Compensation Net of Holdbacks:	\$13,341.20
Amount of Expense Requested:	\$32.00
Total Compensation and Expenses (Net of Holdbacks):	\$13,373.20

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 101] (“**Interim Compensation Order**”), dated February 24, 2023, Morrison Cohen LLP (“**MC**”) hereby submits this Eleventh Fee Statement for the month of December 2023 (this “**Eleventh Fee Statement**”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtors for the period December 1, 2023 through and including December 31, 2023 (“**Tenth Monthly Fee Period**”). By this Eleventh Fee Statement, and after taking into account certain voluntary reductions, MC seeks payment in the amount of \$13,373.20, which comprises (a) 80% of the total amount \$16,676.50) of compensation sought for actual and necessary services rendered during the Tenth Monthly Fee Period and (b) reimbursement in the amount of \$32.00, which comprises 100% of actual and necessary expenses incurred in accordance with such services.

SERVICES RENDERED AND EXPENSES INCURRED

1. Attached hereto as **Exhibit A** is a summary of MC’s professionals by individual, setting forth the: (a) name and title of each individual who provided services for the Tenth Monthly Fee Period; (b) aggregate hours spent by each individual; (c) MC’s current hourly billing rate for each individual that provided services in the Tenth Monthly Fee Period; (d) amount of fees earned by each MC professional; and (d) year of admittance and jurisdiction for each attorney that is included on this Eleventh Fee Statement. The blended hourly billing rate of MC’s timekeepers in the Tenth Monthly Fee Period is approximately \$877.71/hour.

2. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought, by project category for the Tenth Monthly Fee Period.

3. Attached hereto as **Exhibit C** is itemized time records of MC's professionals for the Tenth Monthly Fee Period and summary materials related thereto.

4. Attached hereto as **Exhibit D** is a summary of expenses incurred and reimbursement of expenses sought, by expense type, for the Tenth Monthly Fee Period.

5. Attached hereto as **Exhibit E** is an itemized record of all expenses for the Tenth Monthly Fee Period.

NOTICE OF OBJECTION PROCEDURES

6. Consistent with the terms of the Interim Compensation Order, notice of this Eleventh Fee Statement shall be given by email, hand or overnight delivery upon the following parties ("**Notice Parties**"): (a) The Debtors c/o Genesis Global Holdco, LLC, Attn: Arianna Pretto-Sankman (e-mail: arianna@genesistrading.com); (b) Counsel to the Debtors, Cleary Gottlieb Steen & Hamilton, One Liberty Plaza, New York, New York 10006, Attn: Sean A. O'Neal, Esq., Jane VanLare, Esq. (e-mail: soneal@cgsh.com; jvanlare@cgsh.com); (c) The United States Trustee for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Suite 515, New York, New York 10004, Attn: Greg Zipes, Esq. (e-mail: greg.zipes@usdoj.gov); and (d) Counsel to the official committee of unsecured creditors, White & Case LLP, 1221 Avenue of the Americas, 49th Floor, New York, New York 10020, Attn: Philip Abelson and Michele Meises (e-mail: philip.abelson@whitecase.com; michele.meises@whitecase.com) and, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Gregory F. Pesce (e-mail: gregory.pesce@whitecase.com).

7. Objections to this Eleventh Fee Statement, if any, must be served upon the Notice Parties, and by e-mail, hand, or overnight delivery, upon MC, 909 Third Avenue, 27th Floor, New York, New York 10022, Attn: Heath D. Rosenblat, Esq. and Jason Gottlieb, Esq. (e-mail: hrosenblat@morrisoncohen.com; jgottlieb@morrisoncohen.com) no later than **February 6, 2024 at 12 PM (Eastern Time) (“Objection Deadline”)**, setting forth the nature of the objection and the specific amount of fees or expenses the objecting party is contesting.

8. If no objections to the Eleventh Fee Statement are received by the Objection Deadline, the Debtors shall pay MC 80% of the fees and 100% of the expenses identified in this Eleventh Fee Statement.

9. To the extent a proper objection to this Eleventh Fee Statement is received on or before the Objection Deadline by MC and the Notice Parties, the Debtors shall withhold payment of just that portion of this Eleventh Fee Statement that the objection contests and promptly pay the remainder of the fees and expenses in the percentages set forth above pursuant to the terms of the Interim Compensation Order. To the extent such objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

[Text Continued On Following Page]

Dated: New York, New York
January 22, 2024

MORRISON COHEN LLP

By: /s/ Heath D. Rosenblat

Heath D. Rosenblat, Esq.

Jason P. Gottlieb, Esq.

909 Third Avenue, 27th Floor

New York, New York 10022

(212) 735-8600

hrosenblat@morrisoncohen.com

jgottlieb@morrisoncohen.com

*Special Litigation and Enforcement Counsel
for Debtors and Debtors-In-Possession*

EXHIBIT A

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Fee Summary for December 1, 2023 through December 31, 2023

<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to the NY Bar</u>	<u>Rate</u>	<u>Billed Hours</u>	<u>Billed Amount</u>
Gottlieb, Jason P.	Partner	Digital Assets	2002	\$1,200.00	5.7	\$6,840.00
Isaacs, Daniel C.	Partner	Digital Assets	2011	\$875.00	1.0	\$875.00
Rosenblat, Heath D.	Partner	Bankruptcy, Restructuring & Governance	2003	\$900.00	1.9	\$1710.00
Mix, Michael	Partner	Digital Assets	2012	\$875.00	3.9	\$3,412.50
Siconolfi, Sally	Contract Attorney	Bankruptcy, Restructuring & Governance	2005	\$650.00	3.9	\$2,535.00
Roth, Will	Associate	Digital Assets	2017	\$700.00	0.2	\$140.00
Knox, Tukisha	Paralegal	Bankruptcy, Restructuring & Governance	n/a	\$485.00	2.4	\$1,164.00

EXHIBIT B

Fee Summary by Project Category for December 1, 2023 through December 31, 2023

<u>Matter/Description</u>	<u>Hours</u>	<u>Amount</u>
B110 Case Administration	7.8	\$6,084.00
B160 Fee/Employment Applications	2.1	\$1,365.00
B190 Litigation	9.1	\$9,227.50
Total	19.0	\$16,676.50

EXHIBIT C

Time Records for December 1, 2023 through December 31, 2023



030986-0001

GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 01/17/24
INVOICE #: 2223624

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF DECEMBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110		CASE ADMINISTRATION		
12/07/23	HDR	E-MAILS TO/FROM C. RIBERO AND TEAM REGARDING UPCOMING HEARING.	0.20	180.00
12/08/23	TMK	REGISTER H. ROSENBLAT AND S. SICONOLFI FOR ZOOM HEARING	0.20	97.00
12/12/23	HDR	TELEPHONE CALL WITH S. SICONOLFI REGARDING HEARING (.1); FOLLOW-UP TELEPHONE CALLS AND E- MAILS TO/FROM S. SICONOLFI AND T. KNOX REGARDING HEARING ITEMS (.2).	0.30	270.00
12/12/23	TMK	EMAILS TO/FROM S. SICONOLFI REGARDING HEARING (.1); PRINT AND ASSEMBLE PDF DOCUMENTS IN PREPARATION FOR HEARING FOR H. ROSENBLAT (.9)	1.00	485.00
12/12/23	SSI	FOLLOW-UP WITH C. RIBIERO AND H. ROSEBLATT SEPARATELY ON OPEN BANKRUPTCY ISSUES	0.60	390.00
12/13/23	HDR	PREPARE FOR AND ATTEND HEARING (.6); FOLLOW-UP EMAILS TO/FROM J. VANLARE AND J. GOTTLIEB REGARDING SAME (.2)	0.80	720.00
12/18/23	SSI	FOLLOW-UP, ANALYSIS AND REVIEW OF OPEN ITEMS IN CASE (.6) AND ANALYSIS OF BANKRUPTCY DOCKET REGARDING SAME (.6)	1.20	780.00
12/18/23	JXG	EMAIL WITH CLEARY AND [REDACTED] ARBITRATIONS AND BANKRUPTCY STAY	0.40	480.00
12/19/23	HDR	TELEPHONE CALLS AND E-MAILS TO/FROM C. RIBERIO AND S. SICONOLFI REGARDING OPEN CASE ITEMS AND NEXT STEPS.	0.20	180.00
12/20/23	TMK	TELEPHONE CALLS WITH SS REGARDING OPEN ITEMS (.1); REVIEW AND EDIT DOCUMENTS (.3); FILE DOCUMENTS AND EMAIL TO SERVICE AGENT TO EFFECTUATE SERVICE (.5); PREPARE CERTIFICATE OF SERVICE OF SAME (.3)	1.20	582.00
12/21/23	HDR	E-MAILS TO/FROM C. RIBERIO AND S. SICONOLFI CONCERNING OPEN CASE MATTERS (.2); REVIEW OF FILES REGARDING SAME (.2)	0.40	360.00
TOTAL TASK CODE B110		CASE ADMINISTRATION	6.50	4,524.00



030986-0001

GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO

DATE: 01/17/24

INVOICE #: 2223624

BANKRUPTCY MATTER

FOR PROFESSIONAL SERVICES RENDERED AS OF DECEMBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS		
12/19/23	SSI	DRAFT, REVIEW, AND REVISE MONTHLY STATEMENT AND EXHIBITS FOR NOVEMBER	1.80	1,170.00
12/20/23	SSI	FINALIZE NOVEMBER FEE STATEMENT	0.30	195.00
TOTAL TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS	2.10	1,365.00
TASK CODE B190		LITIGATION		
12/13/23	MIM	REVIEW PRIOR EMAILS AND MATERIALS ABOUT [REDACTED] TO RESPOND TO S. O'NEAL QUESTIONS (.30); SEND EMAIL TO S. O'NEAL REGARDING [REDACTED] (.40)	0.70	612.50
12/18/23	MIM	SEND EMAIL RESPONDING TO EMAIL FROM B. LENOX FROM CLEARY REGARDING GENESIS RETAINED CAUSES OF ACTION	0.60	525.00
12/19/23	MIM	REVIEW B. LENOX EMAILS REGARDING GENESIS RETAINED CAUSES OF ACTION (.30); INTERNAL EMAILS REGARDING GENESIS RETAINED CAUSES OF ACTION (.30)	0.60	525.00
12/20/23	MIM	REVIEW CUSTOMER ARBITRATIONS IN ORDER TO ANSWER B. LENOX QUESTIONS FOR RETAINED CAUSES OF ACTION (.8); FOLLOW-UP EMAILS WITH B. LENOX (.50)	1.30	1,137.50
12/21/23	MIM	REVIEW PRIOR ARBITRATIONS IN RESPONSE TO QUESTION OF K. ROSS OF CLEARY REGARDING CLAIMS RECONCILIATION (.30); SEND FOLLOW-UP EMAIL TO K. ROSS OF CLEARY (.20)	0.50	437.50
TOTAL TASK CODE B190		LITIGATION	3.70	3,237.50
GRAND TOTAL FEES			12.30	9,126.50
TOTAL FEES SERVICES				\$ 9,126.50

TASK SUMMARY BY TIMEKEEPER

INIT	TIMEKEEPER NAME	HOURS	VALUE
B110	CASE ADMINISTRATION		
HDR	HEATH D. ROSENBLAT	1.90	1,710.00
JXG	JASON GOTTLIEB	0.40	480.00
SSI	SALLY SICONOLFI	1.80	1,170.00
TMK	TUKISHA KNOX	2.40	1,164.00
SUBTOTAL	B110 CASE ADMINISTRATION	6.50	4,524.00



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 01/17/24
INVOICE #: 2223624

TASK SUMMARY BY TIMEKEEPER

INIT	TIMEKEEPER NAME	HOURS	VALUE
B160	FEE/EMPLOYMENT APPLICATIONS		
SSI	SALLY SICONOLFI	2.10	1,365.00
SUBTOTAL	B160 FEE/EMPLOYMENT APPLICATIONS	2.10	1,365.00
B190	LITIGATION		
MIM	MICHAEL MIX	3.70	3,237.50
SUBTOTAL	B190 LITIGATION	3.70	3,237.50
TOTAL FEES		12.30	9,126.50

TASK SUMMARY FOR FEES:

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	6.50	4,524.00
B160	FEE/EMPLOYMENT APPLICATIONS	2.10	1,365.00
B190	LITIGATION	3.70	3,237.50
TOTAL FEES		12.30	9,126.50

TIMEKEEPER SUMMARY

INIT	TIMEKEEPER NAME	HOURS	AMOUNT
HDR	HEATH D. ROSENBLAT	1.90	1,710.00
JXG	JASON GOTTLIEB	0.40	480.00
MIM	MICHAEL MIX	3.70	3,237.50
SSI	SALLY SICONOLFI	3.90	2,535.00
TMK	TUKISHA KNOX	2.40	1,164.00
TOTAL FEES		12.30	9,126.50

TOTAL BALANCE DUE FOR THIS PERIOD \$ 9,126.50

WIRE INSTRUCTIONS

Bank Name: HSBC
Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 01/17/24
INVOICE #: 2223624

*Number and Account Number shown below are entered correctly, we
will receive the wire.)*

ABA Number: 021 001 088

SWIFT Code (Only for International Wire): MRMDUS33

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 01/17/24

INVOICE #: 2223625

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF DECEMBER 31, 2023

FEE SUMMARY BY MATTER

MATTER NAME	CLIENT-MATTER #	HOURS	\$ AMOUNT
[REDACTED]	030983-0001	5.10	5,695.00
[REDACTED]	030983-0015	0.20	175.00
[REDACTED]	030983-0017	1.40	1,680.00
GRAND TOTALS		6.70	\$ 7,550.00

FEE SUMMARY BY TIMEKEEPER

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	5.30	6,360.00
ISAACS, DANIEL C.	PARTNER	875.00	1.00	875.00
MIX, MICHAEL	PARTNER	875.00	0.20	175.00
ROTH, WILL	ASSOCIATE	700.00	0.20	140.00
GRAND TOTALS			6.70	\$ 7,550.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 01/17/24

INVOICE #: 2223625

FEE SUMMARY BY TASK CODE & TIMEKEEPER

FEE TASK CODE: B110 / Case Administration

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	1.30	1,560.00
TOTALS FOR TASK CODE: B110 Case Administration			1.30	1,560.00

FEE TASK CODE: B190 / Litigation

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,200.00	4.00	4,800.00
ISAACS, DANIEL C.	PARTNER	875.00	1.00	875.00
MIX, MICHAEL	PARTNER	875.00	0.20	175.00
ROTH, WILL	ASSOCIATE	700.00	0.20	140.00
TOTALS FOR TASK CODE: B190 Litigation			5.40	5,990.00

GRAND TOTALS	6.70	\$	7,550.00
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SUMMARY OF DISBURSEMENTS BY MATTER & TYPE

MATTER NAME	CLIENT-MATTER # TYPE	\$ AMOUNT
[REDACTED]	030983-0017 ELECTRONIC DATA STORAGE	32.00
GRAND TOTALS		\$ 32.00

TOTAL BALANCE DUE FOR THIS PERIOD \$ 7,582.00



030983-0001

GENESIS GLOBAL HOLDCO, LLC
[REDACTED]

DATE: 01/17/24

INVOICE #: 2223625

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF DECEMBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110 Case Administration				
12/18/23	JXG	EMAIL WITH CLEARY REGARDING [REDACTED] [REDACTED] FOR TREATMENT UNDER REGULATOR LITIGATION (.2); EMAIL WITH CLIENTS REGARDING STRATEGY (.2)	0.40	480.00
12/27/23	JXG	EMAIL WITH D. ISAACS REGARDING RESPONSE TO COMPLAINT (.1); EMAIL WITH A. PRETTO-SAKMANN REGARDING STRATEGY FOR REGULATOR RESPONSE (.3)	0.40	480.00
TOTAL TASK CODE B110 Case Administration			0.80	960.00
TASK CODE B190 Litigation				
12/11/23	JXG	EMAIL WITH REGULATOR AND TEAM	0.10	120.00
12/12/23	JXG	EMAILS WITH A. WEAVER AND G. TAPALAGA RE: [REDACTED]	0.10	120.00
12/14/23	JXG	CALL WITH CLEARY REGARDING [REDACTED] [REDACTED]	0.30	360.00
12/15/23	JXG	CALL WITH PROSKAUER, WHITE & CASE, AND CLEARY REGARDING [REDACTED] (.6); CALL WITH REGULATOR (.3); FOLLOW-UP CALL WITH A. WEAVER (CLEARY) (.1); EMAIL WITH CLIENT & TEAM (.1)	1.10	1,320.00
12/16/23	JXG	EMAIL WITH CLEARY & TEAM	0.20	240.00
12/17/23	JXG	CALL WITH [REDACTED] RE: REGULATOR ISSUES	1.10	1,320.00
12/18/23	DCI	ATTENTION TO WORKING ON RESPONSE TO COMPLAINT AND STRATEGY.	0.30	262.50
12/19/23	JXG	EMAIL WITH A. FORBES (CLEARY) RE: [REDACTED] [REDACTED]	0.20	240.00
12/27/23	DCI	REVIEW/ANALYZE POTENTIAL RESPONSES TO COMPLAINT.	0.70	612.50
12/28/23	WIR	CORRESPONDENCE REGARDING RESPONSE TO COMPLAINT	0.20	140.00
TOTAL TASK CODE B190 Litigation			4.30	4,735.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 01/17/24

INVOICE #: 2223625

TOTAL FEES SERVICES \$ **5,695.00**

TOTAL BALANCE DUE FOR THIS PERIOD \$ **5,695.00**

ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	3.90	1,200.00	4,680.00
DANIEL C. ISAACS	1.00	875.00	875.00
WILLIAM ROTH	0.20	700.00	140.00
TOTAL FEES	5.10		5,695.00

TOTAL BALANCE DUE FOR THIS PERIOD \$ **5,695.00**



030983-0015

GENESIS GLOBAL HOLDCO, LLC

DATE: 01/17/24

INVOICE #: 2223625

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF DECEMBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B190 Litigation				
12/28/23	MIM	SEND EMAIL TO ARBITRATION PROVIDER RESPONDING TO THEIR QUESTION ABOUT CASE STATUS (.20)	0.20	175.00
TOTAL TASK CODE B190 Litigation			0.20	175.00
TOTAL FEES SERVICES			\$	175.00
TOTAL BALANCE DUE FOR THIS PERIOD			\$	175.00

ATTORNEY	HOURS	RATE	VALUE
MICHAEL MIX	0.20	875.00	175.00
TOTAL FEES	0.20		175.00
TOTAL BALANCE DUE FOR THIS PERIOD		\$	175.00



030983-0017

GENESIS GLOBAL HOLDCO, LLC
[REDACTED]

DATE: 01/17/24

INVOICE #: 2223625

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
250 PARK AVENUE SOUTH, 5TH FLOOR
NEW YORK, NY 10003

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF DECEMBER 31, 2023

DATE	ATTY	DESCRIPTION	HOURS	VALUE
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TASK CODE B110 Case Administration

12/11/23	JXG	CALL WITH REGULATOR (.1); EMAIL WITH CLIENT RE: [REDACTED] (.2)	0.30	360.00
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12/28/23	JXG	EMAIL WITH REGULATOR AND CLIENT RE: [REDACTED]	0.20	240.00
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TOTAL TASK CODE B110 Case Administration			0.50	600.00
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TASK CODE B190 Litigation

12/01/23	JXG	CALL WITH REGULATOR(.1) AND EMAIL WITH CLIENT & CLEARY RE: SAME (.2)	0.30	360.00
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12/18/23	JXG	CALL WITH REGULATOR (.1) AND EMAIL WITH CLIENT RE: SAME (.1)	0.20	240.00
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12/22/23	JXG	CALL WITH REGULATOR (.1); EMAIL WITH CLIENT AND CLEARY RE: SAME (.2)	0.30	360.00
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12/29/23	JXG	EMAIL WITH REGULATOR RE: [REDACTED]	0.10	120.00
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TOTAL TASK CODE B190 Litigation			0.90	1,080.00
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TOTAL FEES SERVICES			\$	1,680.00
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DISBURSEMENTS:				VALUE
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ELECTRONIC DATA STORAGE				32.00
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TOTAL DISBURSEMENTS			\$	32.00
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TOTAL BALANCE DUE FOR THIS PERIOD			\$	1,712.00
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030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 01/17/24

INVOICE #: 2223625

ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	1.40	1,200.00	1,680.00
TOTAL FEES	1.40		1,680.00
TOTAL BALANCE DUE FOR THIS PERIOD		\$	1,712.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 01/17/24

INVOICE #: 2223625

WIRE INSTRUCTIONS

Bank Name: HSBC

Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

SWIFT Code (Only for International Wire): MRMDUS33

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number

EXHIBIT D

Summary of Expenses for December 1, 2023 through December 31, 2023

Expense Category	Total Expenses
Relativity Hosting Fee	\$32.00
Grand Total Expenses	\$32.00

EXHIBIT E

Summary of Expenses for December 1, 2023 through December 31, 2023

Relativity Hosting Fee

12/31/2023 Relativity Hosting December 2023 – 030983-0017 - \$32.00

Objection Deadline: March 7, 2024 at 12PM (Eastern Time)

MORRISON COHEN LLP

909 Third Avenue, 27th Floor

New York, New York 10022

Telephone: (212) 735-8600

Facsimile: (212) 735-8708

Jason P. Gottlieb, Esq.

Heath D. Rosenblat, Esq.

Special Litigation and Enforcement Counsel to the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF TWELFTH FEE STATEMENT THAT OCCURRED IN
THE THIRD FEE APPLICATION PERIOD OF MORRISON
COHEN LLP FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR
THE PERIOD FROM JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

Name of Applicant:	Morrison Cohen LLP
Authorized to Provide Services to:	Genesis Global Holdco, LLC, <i>et al.</i>
Date of Retention:	An entered order [ECF No. 106], dated February 24, 2023, authorizing retention <i>nunc pro tunc</i> to the PetitionDate (<i>i.e.</i> , January 19, 2023), as applicable for each Debtor.
Period for which Compensation and Expenses are Sought:	01/01/2024 through 01/31/2024 Monthly Fee Statement for January 2024
Amount of Compensation Requested:	\$52,077.00

¹ The debtors and debtors-in-possession (collectively, “**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, New York 10003.

Less 20% Holdback:	\$10,415.40
Compensation Net of Holdbacks:	\$41,661.60
Amount of Expense Requested:	\$16.00
Total Compensation and Expenses (Net of Holdbacks):	\$41,677.60

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 101] (“**Interim Compensation Order**”), dated February 24, 2023, Morrison Cohen LLP (“**MC**”) hereby submits this Twelfth Fee Statement for the month of January 2024 (this “**Twelfth Fee Statement**”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtors for the period January 1, 2024 through and including January 31, 2024 (“**Eleventh Monthly Fee Period**”). By this Twelfth Fee Statement, and after taking into account certain voluntary reductions, MC seeks payment in the amount of \$41,677.60, which comprises (a) 80% of the total amount (*i.e.*, \$52,077.00) of compensation sought for actual and necessary services rendered during the Eleventh Monthly Fee Period and (b) reimbursement in the amount of \$16.00, which comprises 100% of actual and necessary expenses incurred in accordance with such services.

SERVICES RENDERED AND EXPENSES INCURRED

1. Attached hereto as **Exhibit A** is a summary of MC’s professionals by individual, setting forth the: (a) name and title of each individual who provided services for the Eleventh Monthly Fee Period; (b) aggregate hours spent by each individual; (c) MC’s current hourly billing rate for each individual that provided services in the Eleventh Monthly Fee Period; (d) amount of fees earned by each MC professional; and (d) year of admittance and jurisdiction for each attorney that is included on this Twelfth Fee Statement. The blended hourly billing rate of MC’s timekeepers in the Eleventh Monthly Fee Period is approximately \$1,037.39/hour.

2. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought, by project category for the Eleventh Monthly Fee Period.

3. Attached hereto as **Exhibit C** is itemized time records of MC's professionals for the Eleventh Monthly Fee Period and summary materials related thereto.

4. Attached hereto as **Exhibit D** is a summary of expenses incurred and reimbursement of expenses sought, by expense type, for the Eleventh Monthly Fee Period.

5. Attached hereto as **Exhibit E** is an itemized record of all expenses for the Eleventh Monthly Fee Period.

NOTICE OF OBJECTION PROCEDURES

6. Consistent with the terms of the Interim Compensation Order, notice of this Twelfth Fee Statement shall be given by email, hand or overnight delivery upon the following parties ("**Notice Parties**"): (a) The Debtors c/o Genesis Global Holdco, LLC, Attn: Arianna Pretto-Sankman (e-mail: arianna@genesistrading.com); (b) Counsel to the Debtors, Cleary Gottlieb Steen & Hamilton, One Liberty Plaza, New York, New York 10006, Attn: Sean A. O'Neal, Esq., Jane VanLare, Esq. (e-mail: soneal@cgsh.com; jvanlare@cgsh.com); (c) The United States Trustee for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Suite 515, New York, New York 10004, Attn: Greg Zipes, Esq. (e-mail: greg.zipes@usdoj.gov); and (d) Counsel to the official committee of unsecured creditors, White & Case LLP, 1221 Avenue of the Americas, 49th Floor, New York, New York 10020, Attn: Philip Abelson and Michele Meises (e-mail: philip.abelson@whitecase.com; michele.meises@whitecase.com) and, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Gregory F. Pesce (e-mail: gregory.pesce@whitecase.com).

7. Objections to this Twelfth Fee Statement, if any, must be served upon the Notice Parties, and by e-mail, hand, or overnight delivery, upon MC, 909 Third Avenue, 27th Floor, New York, New York 10022, Attn: Heath D. Rosenblat, Esq. and Jason Gottlieb, Esq. (e-mail: hrosenblat@morrisoncohen.com; jgottlieb@morrisoncohen.com) no later than **March 7, 2024 at 12 PM (Eastern Time) (“Objection Deadline”)**, setting forth the nature of the objection and the specific amount of fees or expenses the objecting party is contesting.

8. If no objections to the Twelfth Fee Statement are received by the Objection Deadline, the Debtors shall pay MC 80% of the fees and 100% of the expenses identified in this Twelfth Fee Statement.

9. To the extent a proper objection to this Twelfth Fee Statement is received on or before the Objection Deadline by MC and the Notice Parties, the Debtors shall withhold payment of just that portion of this Twelfth Fee Statement that the objection contests and promptly pay the remainder of the fees and expenses in the percentages set forth above pursuant to the terms of the Interim Compensation Order. To the extent such objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

[Text Continued On Following Page]

Dated: New York, New York
February 22, 2024

MORRISON COHEN LLP

By: /s/ Heath D. Rosenblat

Heath D. Rosenblat, Esq.

Jason P. Gottlieb, Esq.

909 Third Avenue, 27th Floor

New York, New York 10022

(212) 735-8600

hrosenblat@morrisoncohen.com

jgottlieb@morrisoncohen.com

*Special Litigation and Enforcement Counsel
for Debtors and Debtors-In-Possession*

EXHIBIT A

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Fee Summary for January 1, 2024 through January 31, 2024

<u>Timekeeper</u>	<u>Position</u>	<u>Department</u>	<u>Year Admitted to the NY Bar</u>	<u>Rate</u>	<u>Billed Hours</u>	<u>Billed Amount</u>
Gottlieb, Jason P.	Partner	Digital Assets	2002	\$1,400.00	14.4	\$20,160.00
Isaacs, Daniel C.	Partner	Digital Assets	2011	\$875.00	23.2	\$22,620.00
Rosenblat, Heath D.	Partner	Bankruptcy, Restructuring & Governance	2003	\$1000.00	.8	\$800.00
Siconolfi, Sally	Contract Attorney	Bankruptcy, Restructuring & Governance	2005	\$650.00	2.7	\$1,755.00
Roth, Will	Associate	Digital Assets	2017	\$770.00	8.1	\$6,237.00
Knox, Tukisha	Paralegal	Bankruptcy, Restructuring & Governance	n/a	\$505.00	1.0	\$505.00

EXHIBIT B

Fee Summary by Project Category for January 1, 2024 through January 31, 2024

<u>Matter/Description</u>	<u>Hours</u>	<u>Amount</u>
B110 Case Administration	7.3	\$8,490.00
B160 Fee/Employment Applications	2.2	\$1,570.00
B190 Litigation	40.7	\$42,017.00
Total	50.2	\$52,077.00

EXHIBIT C

Time Records for January 1, 2024 through January 31, 2024



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 02/20/24
INVOICE #: 2224993

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
175 GREENWICH STREET, 38TH FLOOR
NEW YORK, NY 10007

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF JANUARY 31, 2024

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110		CASE ADMINISTRATION		
01/05/24	HDR	ATTENTION TO OPEN CASE ITEMS.	0.20	200.00
01/18/24	HDR	FOLLOW-UP ON OPEN CASE ITEMS.	0.20	200.00
01/18/24	SSI	EMAILS WITH LITIGATORS TO DISCUSS STATUS OF OPEN CASE MATTERS	0.60	390.00
01/22/24	SSI	EMAILS WITH LITIGATORS FOLLOWING UP INTERNALLY ON RECENT FILINGS IN CASE	0.30	195.00
01/22/24	TMK	REVIEW, PREPARE AND FILE DOCUMENTS (.5); EMAIL TO SERVICING AGENT TO EFFECTUATE SERVICE (.1); CIRCULATE OBJECTION DEADLINES TO TEAM (.1); PREPARE AND FILE CERTIFICATE OF SERVICE (.3)	1.00	505.00
01/25/24	JXG	CALL WITH MARCUM REGARDING REVIEW OF OPEN LITIGATION MATTERS	0.50	700.00
01/29/24	JXG	EMAILS WITH M. MIX & V. UPADHYAYA REGARDING GENESIS AUDIT LETTER	0.30	420.00
01/30/24	JXG	CALL WITH TEAM REGARDING AUDIT RESPONSE REVIEW	0.40	560.00
01/31/24	JXG	EMAIL REGARDING AUDIT RESPONSE REVIEW	0.60	840.00
TOTAL TASK CODE B110		CASE ADMINISTRATION	4.10	4,010.00
TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS		
01/22/24	HDR	TELEPHONE CALLS AND E-MAILS TO/FROM S. SICONOLFI AND OTHERS REGARDING FEE STATEMENT MATTERS.	0.40	400.00
01/22/24	SSI	DRAFT, REVIEW, AND REVISE MONTHLY STATEMENT AND EXHIBITS FOR DECEMBER	1.80	1,170.00
TOTAL TASK CODE B160		FEE/EMPLOYMENT APPLICATIONS	2.20	1,570.00
TASK CODE B190		LITIGATION		
01/05/24	DCI	CONF. WITH CLEARY REGARDING LEGAL ISSUES ARISING IN BANKRUPTCY REGARDING GENESIS PRODUCTS AND SERVICES (1.1); CORR. WITH CLEARY REGARDING SAME (.3)	1.40	1,365.00



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 02/20/24
INVOICE #: 2224993

FOR PROFESSIONAL SERVICES RENDERED AS OF JANUARY 31, 2024

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TOTAL TASK CODE	B190	LITIGATION	1.40	1,365.00
GRAND TOTAL FEES			7.70	6,945.00
TOTAL FEES SERVICES			\$	6,945.00

TASK SUMMARY BY TIMEKEEPER

INIT	TIMEKEEPER NAME	HOURS	VALUE
B110	CASE ADMINISTRATION		
HDR	HEATH D. ROSENBLAT	0.40	400.00
JXG	JASON GOTTLIEB	1.80	2,520.00
SSI	SALLY SICONOLFI	0.90	585.00
TMK	TUKISHA KNOX	1.00	505.00
SUBTOTAL	B110 CASE ADMINISTRATION	4.10	4,010.00
B160	FEE/EMPLOYMENT APPLICATIONS		
HDR	HEATH D. ROSENBLAT	0.40	400.00
SSI	SALLY SICONOLFI	1.80	1,170.00
SUBTOTAL	B160 FEE/EMPLOYMENT APPLICATIONS	2.20	1,570.00
B190	LITIGATION		
DCI	DANIEL C. ISAACS	1.40	1,365.00
SUBTOTAL	B190 LITIGATION	1.40	1,365.00
TOTAL FEES		7.70	6,945.00

TASK SUMMARY FOR FEES:

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	CASE ADMINISTRATION	4.10	4,010.00
B160	FEE/EMPLOYMENT APPLICATIONS	2.20	1,570.00
B190	LITIGATION	1.40	1,365.00
TOTAL FEES		7.70	6,945.00



030986-0001 GENESIS GLOBAL CAPITAL, LLC, GENESIS GLO
BANKRUPTCY MATTER

DATE: 02/20/24
INVOICE #: 2224993

TIMEKEEPER SUMMARY

INIT	TIMEKEEPER NAME	HOURS	AMOUNT
DCI	DANIEL C. ISAACS	1.40	1,365.00
HDR	HEATH D. ROSENBLAT	0.80	800.00
JXG	JASON GOTTLIEB	1.80	2,520.00
SSI	SALLY SICONOLFI	2.70	1,755.00
TMK	TUKISHA KNOX	1.00	505.00
TOTAL FEES		7.70	6,945.00
TOTAL BALANCE DUE FOR THIS PERIOD			\$ 6,945.00

WIRE INSTRUCTIONS

Bank Name: HSBC

Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

SWIFT Code (Only for International Wire): MRMDUS33

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24

INVOICE #: 2224992

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
175 GREENWICH STREET, 38TH FLOOR
NEW YORK, NY 10007

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF JANUARY 31, 2024

FEE SUMMARY BY MATTER

MATTER NAME	CLIENT-MATTER #	HOURS	\$ AMOUNT
[REDACTED]	030983-0001	30.00	30,643.50
[REDACTED]	030983-0017	12.50	14,488.50
GRAND TOTALS		42.50	\$ 45,132.00

FEE SUMMARY BY TIMEKEEPER

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,400.00	12.60	17,640.00
ISAACS, DANIEL C.	PARTNER	975.00	21.80	21,255.00
ROTH, WILL	ASSOCIATE	770.00	8.10	6,237.00
GRAND TOTALS			42.50	\$ 45,132.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24
INVOICE #: 2224992

FEE SUMMARY BY TASK CODE & TIMEKEEPER

FEE TASK CODE: B110 / Case Administration

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,400.00	3.20	4,480.00
TOTALS FOR TASK CODE: B110 Case Administration			3.20	4,480.00

FEE TASK CODE: B190 / Litigation

NAME	TITLE	HOURLY RATE	HOURS	\$ AMOUNT
GOTTLIEB, JASON	PARTNER	1,400.00	9.40	13,160.00
ISAACS, DANIEL C.	PARTNER	975.00	21.80	21,255.00
ROTH, WILL	ASSOCIATE	770.00	8.10	6,237.00
TOTALS FOR TASK CODE: B190 Litigation			39.30	40,652.00

GRAND TOTALS	42.50	\$	45,132.00
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SUMMARY OF DISBURSEMENTS BY MATTER & TYPE

MATTER NAME	CLIENT-MATTER # TYPE	\$ AMOUNT
	030983-0017 ELECTRONIC DATA STORAGE	16.00
GRAND TOTALS		\$ 16.00

TOTAL BALANCE DUE FOR THIS PERIOD\$ 45,148.00



030983-0001

GENESIS GLOBAL HOLDCO, LLC
[REDACTED]

DATE: 02/20/24
INVOICE #: 2224992

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
175 GREENWICH STREET, 38TH FLOOR
NEW YORK, NY 10007

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF JANUARY 31, 2024

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110 Case Administration				
01/04/24	JXG	DISCUSSION WITH D. ISAACS (.5); DISCUSSION WITH [REDACTED] COUNSEL (.3); EMAIL WITH A. PRETTO-SAKMANN AND A. WEAVER REGARDING: UPDATE ON DISCUSSION WITH [REDACTED] (.2); EMAIL WITH DEFENSE COUNSEL REGARDING: COORDINATION (.2)	1.20	1,680.00
01/10/24	JXG	CALL WITH J. BAUGHMAN (.3); EMAIL WITH CLIENT REGARDING SAME (.2); EMAIL WITH G. TAPALAGA (.1); EMAIL WITH A. PRETTO-SAKMANN & CLEARY TEAM REGARDING REVIEW OF CALL WITH [REDACTED] COUNSEL (.2)	0.80	1,120.00
TOTAL TASK CODE B110 Case Administration			2.00	2,800.00
TASK CODE B190 Litigation				
01/02/24	JXG	CALL WITH A. WEAVER (CLEARY) REGARDING STRATEGY (.2); EMAIL WITH DEFENSE COUNSEL REGARDING COORDINATION (.3)	0.50	700.00
01/02/24	DCI	ANALYZE COMPLAINT AND POTENTIAL [REDACTED] COMPLAINT (1.2); CONF. WITH TEAM REGARDING SAME (.3)	1.50	1,462.50
01/02/24	WIR	CORRESPONDENCE WITH TEAM REGARDING [REDACTED] COMPLAINT	0.30	231.00
01/04/24	WIR	CORRESPONDENCE WITH CLIENT AND ALSO INTERNALLY (SEPARATELY) REGARDING POTENTIAL SETTLEMENT	0.70	539.00
01/04/24	DCI	LEGAL RESEARCH REGARDING POTENTIAL [REDACTED] TO COMPLAINT (2.1); ANALYZE COMPLAINT (.9); CORR. WITH CLIENT REGARDING SAME (.2)	3.20	3,120.00
01/05/24	DCI	ANALYSIS REGARDING POTENTIAL [REDACTED] COMPLAINT (1.4); CONF. WITH COUNSEL FOR [REDACTED] (.7); DRAFT [REDACTED] (.5)	2.60	2,535.00
01/05/24	WIR	ANALYSIS OF (1.7) AND WORK ON DRAFTING [REDACTED] (2.1)	3.80	2,926.00
01/08/24	WIR	REVISE [REDACTED]	1.90	1,463.00
01/08/24	DCI	DRAFT [REDACTED] (2.6); CORR. WITH CO-DEFENDANTS' COUNSEL (.6).	3.20	3,120.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24
INVOICE #: 2224992

FOR PROFESSIONAL SERVICES RENDERED AS OF JANUARY 31, 2024

DATE	ATTY	DESCRIPTION	HOURS	VALUE
01/09/24	DCI	██████████ TO COMPLAINT.	0.90	877.50
01/09/24	JXG	EMAIL WITH G. TAPALAGA REGARDING COMPLAINT AMENDMENT (.1); EMAIL WITH CLEARY REGARDING SAME (.2)	0.30	420.00
01/10/24	WIR	CORRESPONDENCE AND DISCUSSION REGARDING AMENDED COMPLAINT	0.30	231.00
01/10/24	DCI	CONF. WITH COUNSEL FOR ██████████ (.4); ANALYZE ██████████ TO COMPLAINT (.5)	0.90	877.50
01/11/24	DCI	CONF WITH REGULATOR (0.4); ANALYZE ██████████ TO COMPLAINT (1.1)	1.50	1,462.50
01/11/24	WIR	CORRESPONDENCE REGARDING ██████████ TO FORTHCOMING AMENDED COMPLAINT	0.30	231.00
01/11/24	JXG	CALL WITH REGULATOR (.4); EMAILS WITH CLIENT AND CLEARY REGARDING REGULATOR CALL (.2) AND DRAFT STIP (.2)	0.80	1,120.00
01/12/24	JXG	ATTENTION TO EXECUTING TIMING STIP	0.20	280.00
01/12/24	DCI	ATTENTION TO STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT (.4); CORR. WITH CLIENT AND CLEARY REGARDING CASE UPDATES (.3)	0.70	682.50
01/16/24	DCI	CONF. WITH CLEARY REGARDING STRATEGY (.3); ANALYSIS REGARDING ██████████ TO COMPLAINT (.9)	1.20	1,170.00
01/22/24	JXG	REGULATOR STRATEGY CALL WITH CLEARY / ██████████ COUNSEL	0.50	700.00
01/23/24	JXG	EMAIL WITH CLEARY REGARDING STRATEGY	0.30	420.00
01/23/24	DCI	PREPARE CASE DESCRIPTION FOR AUDIT RESPONSE LETTER.	0.20	195.00
01/24/24	JXG	CALL WITH CLEARY (L. DASSIN / S. O'NEAL) REGARDING REGULATOR STRATEGY	0.50	700.00
01/25/24	JXG	CALL WITH REGULATOR (.5); FOLLOW-UP DISCUSSION WITH S. O'NEAL (.2); EMAIL WITH S. O'NEAL REGARDING ██████████ (.2)	0.90	1,260.00
01/26/24	JXG	EMAIL WITH S. O'NEAL REGARDING OUTLINE POINTS AND FOLLOW-UP ON 1/25 CALL	0.20	280.00
01/27/24	JXG	EMAIL WITH CLEARY REGARDING POTENTIAL SETTLEMENT ISSUES	0.20	280.00
01/29/24	JXG	EMAIL WITH G. TAPALAGA REGARDING FOLLOW UP QUESTION & SETTING UP A CALL TO DISCUSS	0.20	280.00
01/31/24	JXG	EMAIL WITH CLEARY REGARDING SETTLEMENT ISSUES	0.20	280.00
TOTAL TASK CODE B190 Litigation			28.00	27,843.50
TOTAL FEES SERVICES			\$	30,643.50



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24

INVOICE #: 2224992

TOTAL BALANCE DUE FOR THIS PERIOD	\$	30,643.50
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ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	6.80	1,400.00	9,520.00
DANIEL C. ISAACS	15.90	975.00	15,502.50
WILLIAM ROTH	7.30	770.00	5,621.00
TOTAL FEES	30.00		30,643.50

TOTAL BALANCE DUE FOR THIS PERIOD	\$	30,643.50
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030983-0017

GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24

INVOICE #: 2224992

ARIANNA PRETTO-SAKMANN
GENESIS GLOBAL TRADING, INC.
175 GREENWICH STREET, 38TH FLOOR
NEW YORK, NY 10007

TAXPAYER IDENTIFICATION
NUMBER 13-3205994

FOR PROFESSIONAL SERVICES RENDERED AS OF JANUARY 31, 2024

DATE	ATTY	DESCRIPTION	HOURS	VALUE
TASK CODE B110 Case Administration				
01/23/24	JXG	EMAIL WITH E. REILLY REGARDING PROPOSED CONFIDENTIALITY ORDER (.2); EMAIL WITH A. PRETTO-SAKMANN REGARDING SETTLEMENT OFFER (.3); EMAIL WITH CLIENTS REGARDING REGULATOR FINAL JUDGMENT (.2); EMAIL WITH CLEARY REGARDING FINAL JUDGMENT REVIEW (.2)	0.90	1,260.00
01/30/24	JXG	ATTENTION TO FILING OF NOTICE OF APPROVAL OF SETTLEMENT	0.30	420.00
TOTAL TASK CODE B110 Case Administration			1.20	1,680.00
TASK CODE B190 Litigation				
01/02/24	DCI	ANALYZE DRAFT SETTLEMENT AGREEMENTS.	0.80	780.00
01/03/24	JXG	EMAIL WITH S. LEVANDER REGARDING CONSENT AND JUDGMENT EDITS	0.20	280.00
01/04/24	JXG	EMAIL WITH S. LEVANDER JUDGEMENT & CONSENT (.1); REVIEW REVISIONS TO SETTLEMENT DOCUMENTS (.2)	0.30	420.00
01/04/24	WIR	CORRESPONDENCE REGARDING SETTLEMENT	0.20	154.00
01/06/24	JXG	EMAIL WITH A. WEAVER (CLEARY) REGARDING REGULATOR [REDACTED]	0.10	140.00
01/08/24	JXG	EMAIL WITH D. ISAACS REGARDING MARKUP REVIEW AND COMMENTS (.2); EMAIL WITH S. LEVANDER & S. O'NEAL REGARDING STRATEGY AND ADVICE (.2)	0.40	560.00
01/08/24	DCI	REVIEW DRAFT SETTLEMENT AGREEMENTS.	0.50	487.50
01/09/24	DCI	CONF. WITH CLEARY REGARDING DRAFT SETTLEMENT AGREEMENTS.	0.50	487.50
01/09/24	JXG	EMAIL WITH S. O'NEAL REGARDING DRAFT REVIEW (.2); REVIEW OF COMMITTEE COMMENTS (.2); CALL WITH CLEARY (O'NEAL AND LEVANDER) REGARDING DRAFT SETTLEMENT DOCUMENTS (.9)	1.30	1,820.00
01/10/24	JXG	EMAIL WITH E. REILLY (REGULATOR)	0.10	140.00
01/10/24	DCI	REVIEW COMMENTS ON SETTLEMENT AGREEMENTS.	0.30	292.50



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GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24
INVOICE #: 2224992

FOR PROFESSIONAL SERVICES RENDERED AS OF JANUARY 31, 2024

DATE	ATTY	DESCRIPTION	HOURS	VALUE
01/11/24	JXG	CALL WITH S. O'NEAL (CLEARY) REGARDING REGULATOR STRATEGY ISSUES	0.20	280.00
01/18/24	JXG	EMAIL WITH E. REILLY (REGULATOR)	0.20	280.00
01/19/24	JXG	EMAIL WITH CLEARY REGARDING REGULATOR SETTLEMENT DOCUMENTS MARKUP (.2); REVIEW OF MARKUP (.2)	0.40	560.00
01/20/24	JXG	EMAIL WITH CLEARY REGARDING REGULATOR SETTLEMENT DOCUMENTS MARKUP (.1); EMAIL WITH REGULATOR REGARDING SAME (.1)	0.20	280.00
01/22/24	DCI	CONF. WITH CLEARY REGARDING BANKRUPTCY ISSUES.	0.70	682.50
01/23/24	DCI	PREPARE SUMMARY OF CASE (.4); REVIEW/ANALYZE REGULATOR EDITS TO CONSENT AND FINAL JUDGMENT (.5).	0.90	877.50
01/23/24	WIR	CORRESPONDENCE REGARDING SETTLEMENT PAPERS	0.20	154.00
01/24/24	WIR	FINALIZE SETTLEMENT PAPERS	0.40	308.00
01/24/24	DCI	ANALYSIS REGARDING REVISED CONSENT AND JUDGMENT.	0.50	487.50
01/24/24	JXG	EMAIL WITH S. LEVANDER AND CLEARY TEAM REGARDING REGULATOR DEADLINE (.2); EMAIL WITH W. ROTH REGARDING CONSENTS (.3); EMAIL WITH REGULATOR REGARDING SAME (.1)	0.60	840.00
01/25/24	JXG	EMAIL WITH S. LEVANDER REGARDING UPDATE ON CALL WITH REGULATOR	0.10	140.00
01/29/24	JXG	EMAIL WITH A. SAENZ REGARDING [REDACTED] CALL REVIEW & STRATEGY	0.10	140.00
01/29/24	DCI	CORR. WITH CLEARY REGARDING [REDACTED] ISSUES.	0.30	292.50
01/30/24	DCI	CONF. WITH CLEARY REGARDING [REDACTED].	0.60	585.00
01/30/24	JXG	CALL WITH CLEARY REGARDING STRATEGY	0.40	560.00
01/31/24	DCI	CORR. WITH CLEARY REGARDING [REDACTED] (.4); ANALYSIS REGARDING SAME REGARDING [REDACTED] (.4).	0.80	780.00
TOTAL TASK CODE B190 Litigation			11.30	12,808.50
TOTAL FEES SERVICES			\$	14,488.50

DISBURSEMENTS:	VALUE
ELECTRONIC DATA STORAGE	16.00



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24

INVOICE #: 2224992

DISBURSEMENTS:	VALUE
TOTAL DISBURSEMENTS	\$ 16.00
TOTAL BALANCE DUE FOR THIS PERIOD	\$ 14,504.50

ATTORNEY	HOURS	RATE	VALUE
JASON GOTTLIEB	5.80	1,400.00	8,120.00
DANIEL C. ISAACS	5.90	975.00	5,752.50
WILLIAM ROTH	0.80	770.00	616.00
TOTAL FEES	12.50		14,488.50
TOTAL BALANCE DUE FOR THIS PERIOD		\$	14,504.50



030983

GENESIS GLOBAL HOLDCO, LLC

DATE: 02/20/24

INVOICE #: 2224992

WIRE INSTRUCTIONS

Bank Name: HSBC

Bank Address: 452 Fifth Avenue
New York, NY 10018

(Please note that the Bank Address may vary, but as long as the ABA Number and Account Number shown below are entered correctly, we will receive the wire.)

ABA Number: 021 001 088

SWIFT Code (Only for International Wire): MRMDUS33

Account Number: 610-044460

Account Name: Morrison Cohen LLP
Operating Account

Account Address: 909 Third Avenue, 27th Floor
New York, NY 10022

Special Instructions: Please reference Client Name and/or Client Number

EXHIBIT D

Summary of Expenses for January 1, 2024 through January 31, 2024

Expense Category	Total Expenses
Relativity Hosting Fee	\$16.00
Grand Total Expenses	\$16.00

EXHIBIT E

Summary of Expenses for January 1, 2024 through January 31, 2024

Relativity Hosting Fee

01/31/2024 Relativity Hosting January 2024 – 030983-0017 - \$16.00

EXHIBIT D

Morrison Cohen LLP
Special Litigation and Enforcement Counsel for Debtors and Debtors-In-Possession

Certification

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

CERTIFICATION OF HEATH D. ROSENBLAT

I, Heath D. Rosenblat, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner in and submit this Certification on behalf of Morrison Cohen LLP (“**MC**”), as special litigation and enforcement counsel for the Debtors in the Chapter 11 cases. In compliance with the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases, adopted January 29, 2013 (“**Local Guidelines**”), and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted May 17, 1996 (“**U.S. Trustee Guidelines**,” and, together with the Local Guidelines, “**Guidelines**”), I hereby certify as follows.

2. I have reviewed the *Third Interim Application of Morrison Cohen LLP, Special Litigation and Enforcement Counsel to the Debtors, for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from October 1, 2023 through January 31, 2024* (“**Third Interim Application**”), which seeks interim approval and payment of certain legal fees for services rendered by MC for the

¹ The debtors and debtors-in-possession (collectively, “**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

Debtors in the Litigations², the Investigations, and in connection with the Chapter 11 Cases and reimbursement of certain expenses incurred in connection with the Chapter 11 Cases, and it complies with the Guidelines, Section 330 of the Bankruptcy Code, and Bankruptcy Rule 2016.

3. As required by Section B.1 of the Local Guidelines, I certify that:

- a. I have read the Application;
- b. To the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought in the Application fall within the Local Guidelines;
- c. The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by MC and are generally accepted by MC's clients; and
- d. In providing reimbursable expense, MC does not make a profit on such service, whether the service is performed by MC in-house or through a third party.

4. Pursuant to section B.2 of the Local Guidelines, I certify that MC has complied with provisions requiring it to provide notice to certain designated parties of a statement of MC's fees and expenses accrued during the previous months.

5. In respect of Section B.3 of the Local Guidelines, I certify that copies of the Third Interim Application are being provided to: (a) the Office of the United States Trustee, and (b) prior to any hearing, will be provided to those parties who have filed a notice of appearance and request for service of pleadings in the Chapter 11 Cases pursuant to Bankruptcy Rule 2002.

6. In accordance with Federal Rule of Bankruptcy Procedure 2016(a) and Section 504 of the Bankruptcy Code, no agreement or understanding exists between me, my firm, or any attorney thereof, on the one hand, and any other person, on the other hand, for the division of such compensation as my firm may receive from the Interim Application, nor will any division

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Third Interim Application.

of fees prohibited by section 504 of the Bankruptcy Code be made by me, or any attorney of my firm.

7. The following is provided in response to the request for additional information set forth in ¶ C.5 of the UST Guidelines.

Question:	Did MC agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Third Fee Period?
Answer:	No.
Question:	If the fees sought in this Third Interim Application as compared to the fees budgeted for the time period covered by this Third Interim Application are higher by 10% or more, did MC discuss the reasons for the variation with the Debtors?
Answer:	N/A (MC was not asked for a budget).
Question:	Have any of the professionals included in this Third Interim Application varied their hourly rate based on the geographic location of these Chapter 11 Cases?
Answer:	No.
Question:	Does the Third Interim Application include time or fees relating to review, revising, or reducing time records or preparing, reviewing or revising invoices? If so, please quantify by hours and fees.
Answer:	No.
Question:	Does the Third Interim Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.
Answer:	No.
Question:	If the Third Interim Application includes any rate increases since MC's retention, did the Debtors review and approve of those rate increase in advance? Did the Debtors agree when retaining MC to accept all future rate increases?
Answer:	Yes, the Third Interim Application includes customary annual rate increases that were addressed with Debtors when MC was retained, were reviewed and approved by the Debtors, and were shared via notice to all parties in the case.

I certify, under penalty of perjury, that the foregoing statements made by me are true and correct, to the best of my knowledge, information, and belief.

Dated: New York, New York
March 18, 2024

MORRISON COHEN LLP

By: /s/ Heath D. Rosenblat
Heath D. Rosenblat